FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 1252 / 1299

Date Filmed 7/7/83 Camera No. --- 2

Cameraman SDC

8304042002

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 28, 1983

Thomas D. Barr, Esquire
Joseph R. Sahid, Esquire
Cravath, Swaine and Moore
One Chase Manhattan Plaza
New York, New York 10005

RE: MUR 1252/1299

Dear Mr. Barr and Mr. Sahid:

Pursuant to your request, enclosed is a copy of the General Counsel's Report which was before the Commission at the time of its May 24, 1983 determination in MUR 1252/1299. The summary file, including copies of the General Counsel's briefs, will be available in Public Records by Wednesday, June 29, 1983.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

Enclosure

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 28, 1983

Michael L. Burack, Esquire
Roger M. Whitten, Esquire
Counsel for Common Cause
Wilmer and Pickering
1666 K Street, N.W.
Washington, D.C. 20006

RE: MUR 1252/1299

Dear Mr. Burack and Mr. Whitten:

Pursuant to your request, enclosed is a copy of the General Counsel's Report which was before the Commission at the time of its May 24, 1983 determination in MUR 1252/1299. The summary file, including copies of the General Counsel's briefs, will be available in Public Records by Wednesday, June 29, 1983.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel.

Enclosure

8304042000

RECEIVED AT THE FEC
83 JUN 7 PM: 51

6cc#294

LATHAM, WATKINS & HILLS

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1333 NEW HAMPSHIRE AVENUE, N.W.
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WASHINGTON, D.C. 20036-1564
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PAUL R. WATKINS (1899-1973)
DANA LATHAM (1898-1974)

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TELECOPIER (619) 236-3434

June 3, 1983

83 JUN 7 PM: 48

Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Attn: Mrs. Marjorie Emmons
Secretary of the Commission

Re: MUR 1252/1299

Gentlemen:

As counsel to and on behalf of the Americans for an Effective Presidency ("AEP"), we are writing concerning a letter sent us by Charles N. Steele, General Counsel of the Commission, on May 31, 1983. In his letter, Mr. Steele explained that "the Commission determined [on May 24, 1983] that it will take no further action with regard to the violation of 26 U.S.C. § 9012(f) by Americans for an Effective Presidency [in the course of its 1980 presidential campaign activities]."

As explained in our letter to the Commission of April 15, 1983, the Commission's reference to "the violation" of 26 U.S.C. § 9012(f) by AEP in 1980 is inaccurate, because there has never been any adjudication that AEP committed any such violation. The Commission's reference to a "violation" of § 9012(f) by AEP is particularly offensive in light of the United States Supreme Court's determination in Common Cause v. Schmitt, 455 U.S. 129 (1982), affirming 512 F. Supp. 489 (D.D.C. 1980), that AEP could not constitutionally be found to have violated 26 U.S.C. § 9012(f) by its 1980 activities.

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We are, of course, pleased with the action of the Commission, but feel compelled to clarify the record with respect to the unsubstantiated allegations.

Very truly yours,

William A. Long

William A. Long
of LATHAM, WATKINS & HILLS

8304042005

LATHAM, WATKINS & HILLS
ATTORNEYS AT LAW
1333 NEW HAMPSHIRE AVENUE, N.W.
SUITE 1000
WASHINGTON, D.C. 20036-1594

30040897

Federal Election Commission
1325 K Street, N.W.
Washington, D. C. 20463

Attn: Mrs. Marjorie Emmons

FEDERAL ELECTION COMMISSION

19

Telephone allocation charts

The above-described material was removed from this file pursuant to the following exemption provided in the Freedom of Information Act, 5 U.S.C. Section 552(b):

____	(1) Classified Information	____	(6) Personal privacy
____	(2) Internal rules and practices	____	(7) Investigatory files
____	(3) Exempted by other statute	____	(8) Banking Information
____	(4) Trade secrets and commercial or financial information	____	(9) Well Information (geographic or geophysical)
____	(5) Internal Documents		

Signed Irene B. Wasserman

Date 6/22/83

FEC 9-21-77

The charts cited above are not included in the public record for reasons of economy. They are available upon request.

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FEDERAL ELECTION COMMISSION

Telephone bills

The above-described material was removed from this file pursuant to the following exemption provided in the Freedom of Information Act, 5 U.S.C. Section 552(b):

____	(1) Classified Information	X	(6) Personal privacy
____	(2) Internal rules and practices	____	(7) Investigatory files
____	(3) Exempted by other statute	____	(8) Banking Information
____	(4) Trade secrets and commercial or financial information	____	(9) Well Information (geographic or geophysical)
____	(5) Internal Documents		

Signed Anne R. Wardenburg

Date 6/22/83

FEC 9-21-77

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FEDERAL ELECTION COMMISSION

Field reports — states re. Commitment '80

The above-described material was removed from this file pursuant to the following exemption provided in the Freedom of Information Act, 5 U.S.C. Section 552(b):

____	(1) Classified Information	____	(6) Personal privacy
____	(2) Internal rules and practices	____	(7) Investigatory files
____	(3) Exempted by other statute	____	(8) Banking Information
____	(4) Trade secrets and commercial or financial information	____	(9) Well Information (geographic or geophysical)
____	(5) Internal Documents		

Signed Anne R. Thomson

Date 6/23/83

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FEC 9-21-77

The reports cited above have not been placed upon the public record for reasons of economy. They are available upon request.

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FEDERAL ELECTION COMMISSION

List of volunteers or contributors - DC & Va.
Foster - Board of Directors
of National Federation of
Republican Women

The above-described material was removed from this file pursuant to the following exemption provided in the Freedom of Information Act, 5 U.S.C. Section 552(b):

____	(1) Classified Information	X	(6) Personal privacy
____	(2) Internal rules and practices	____	(7) Investigatory files
____	(3) Exempted by other statute	____	(8) Banking Information
____	(4) Trade secrets and commercial or financial information	____	(9) Well Information (geographic or geophysical)
____	(5) Internal Documents		

Signed Irene R. Wernsberg

Date 6/22/87

FEC 9-21-77

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FEDERAL ELECTION COMMISSION 19

The above-described material was removed from this file pursuant to the following exemption provided in the Freedom of Information Act, 5 U.S.C. Section 552(b):

____	(1) Classified Information	____	(6) Personal privacy
____	(2) Internal rules and practices	____	(7) Investigatory files
____	(3) Exempted by other statute	____	(8) Banking Information
____	(4) Trade secrets and commercial or financial information	____	(9) Well Information (geographic or geophysical)
____	(5) Internal Documents		

Signed Lorie A. Wiesenborn

Date 6/22/83

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FEC 9-21-77

Copies of solicitation materials and reports regarding veterans programs of the RNC and of the Reagan Bush Committee have not been placed on the public record for reasons of economy. They are available upon request.

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 2, 1983

Michael L. Burack, Esquire
Counsel for Common Cause
Wilmer and Pickering
1666 K Street, N.W.
Washington, D.C. 20006

RE: MUR 1252/1299

Dear Mr. Burack:

This is in reference to the complaint which you filed on behalf of Common Cause with the Commission on September 26, 1980, concerning expenditures being made in support of the candidacy of Ronald Reagan by Americans for Change ("AFC"), Americans for an Effective Presidency ("AEP"), Fund for a Conservative Majority ("FCM"), the North Carolina Congressional Club (now the "National Congressional Club"), and the National Conservative Political Action Committee ("NCPAC"). This complaint was designated MUR 1299.

Earlier, on September 3, 1980, the Commission had determined on the basis of a complaint filed by the Carter/Mondale Reelection Committee, Inc., and the Democratic National Committee ("DNC"), designated MUR 1252, that there was reason to believe that AFC, FCM and NCPAC had or was about to violate 26 U.S.C. § 9012(f) and 2 U.S.C. § 441a(a); that AFC, FCM, NCPAC and the National Congressional Club had violated 2 U.S.C. § 432(e)(4); and that Ronald Reagan and his authorized committees had violated or would violate 26 U.S.C. § 9012(b)(1) and 2 U.S.C. § 441a(f). The Commission found no reason to believe that Ronald Reagan or one or more of the respondent committees had violated 2 U.S.C. § 434 and no reason to believe that the Republican National Committee had violated 2 U.S.C. § 441a(d)(2). The Commission determined to take no action at that time regarding allegations of violations of 2 U.S.C. § 441a(b) and of 26 U.S.C. § 9003(b)(1), and as to any possible violation of 26 U.S.C. § 9012(a) by the authorized committees of Ronald Reagan. On October 15, 1980, the complaint filed by Common Cause was merged with that filed by the Carter/Mondale Reelection Committee and the DNC. On November 5, 1980, the Commission found reason to believe that AEP and the National Congressional Club had violated 26 U.S.C. § 9012(f).

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After an investigation was conducted and briefs of the General Counsel and responses from certain of the respondents were considered, the Commission determined, on May 24, 1983, to take no further action with regard to the violations of 26 U.S.C. § 9012(f) by AFC, AEP, FCM, the National Congressional Club and NCPAC; to take no further action with regard to the alleged violations of 2 U.S.C. § 441a(a) by AFC, FCM, and NCPAC; to take no further action with regard to the alleged violations by Ronald Reagan and his authorized committees of 2 U.S.C. § 441a(f); to find no probable cause to believe that Ronald Reagan and his authorized committees violated 26 U.S.C. § 9012(b)(1); and to find no probable cause to believe that AFC, FCM, and NCPAC had violated 2 U.S.C. § 432(e)(4). Earlier, on July 13, 1982, the Commission had determined to find no probable cause to believe that the National Congressional Club had violated 2 U.S.C. § 432(e)(4).

Accordingly, the file in this matter is now closed. This matter will become part of the public record within 30 days. Should you wish to submit any factual or legal materials to appear on the public record, please do so within 10 days. The Federal Election Campaign Act allows a complainant to seek judicial review of the Commission's dismissal of this action. See 2 U.S.C. § 437g(a)(8).

If you have any questions, please contact Anne A. Weissenborn, the attorney assigned to this matter, at (202) 523-4175.

Sincerely,

Charles N. Steele
General Counsel

cc: Roger M. Witten, Esquire

8304042001

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 2, 1983

Thomas D. Barr, Esquire
One Chase Manhattan Plaza
New York, New York 10005

RE: MUR 1252/1299

Dear Mr. Barr:

This is in reference to the complaint which you filed on behalf of the Carter/Mondale Reelection Committee and the Democratic National Committee with the Commission on July 2, 1980, concerning expenditures being made in support of the candidacy of Ronald Reagan by Americans for Change ("AFC"), Americans for an Effective Presidency ("AEP"), Fund for a Conservative Majority ("FCM"), the North Carolina Congressional Club (now the "National Congressional Club"), and the National Conservative Political Action Committee ("NCPAC"). This complaint was designated MUR 1252.

On September 3, 1980, the Commission determined that there was reason to believe that AFC, FCM and NCPAC had or was about to violate 26 U.S.C. § 9012(f) and 2 U.S.C. § 441a(a); that AFC, FCM, NCPAC and the National Congressional Club had violated 2 U.S.C. § 432(e)(4); and that Ronald Reagan and his authorized committees had violated or would violate 26 U.S.C. § 9012(b)(1) and 2 U.S.C. § 441a(f). The Commission found no reason to believe that Ronald Reagan or one or more of the respondent committees had violated 2 U.S.C. § 434 and no reason to believe that the Republican National Committee had violated 2 U.S.C. § 441a(d)(2). The Commission determined to take no action at that time regarding allegations of violations of 2 U.S.C. § 441a(b) and of 26 U.S.C. § 9003(b)(1), and as to any possible violation of 26 U.S.C. § 9012(a) by the authorized committees of Ronald Reagan. On October 15, 1980, a complaint filed by Common Cause was merged with that filed by your clients. On November 5, 1980, the Commission found reason to believe that AEP and the National Congressional Club had violated 26 U.S.C. § 9012(f).

After an investigation was conducted and briefs of the General Counsel and responses from certain of the respondents were considered, the Commission determined, on May 24, 1983, to

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take no further action with regard to the violations of 26 U.S.C. § 9012(f) by AFC, AEP, FCM, the National Congressional Club and NCPAC; to take no further action with regard to the alleged violations of 2 U.S.C. § 441a(a) by AFC, FCM, and NCPAC; to take no further action with regard to the alleged violations by Ronald Reagan and his authorized committees of 2 U.S.C. § 441a(f); to find no probable cause to believe that Ronald Reagan and his authorized committees violated 26 U.S.C. § 9012(b)(1); and to find no probable cause to believe that AFC, FCM, and NCPAC had violated 2 U.S.C. § 432(e)(4). Earlier, on July 13, 1982, the Commission had determined to find no probable cause to believe that the National Congressional Club had violated 2 U.S.C. § 432(e)(4).

Accordingly, the file in this matter is now closed. This matter will become part of the public record within 30 days. Should you wish to submit any factual or legal materials to appear on the public record, please do so within 10 days. The Federal Election Campaign Act allows a complainant to seek judicial review of the Commission's dismissal of this action. See 2 U.S.C. § 437g(a)(8).

If you have any questions, please contact Anne A. Weissenborn, the attorney assigned to this matter, at (202) 523-4175.

Sincerely,

Charles N. Steele
General Counsel

cc: Douglas B. Huron, Esquire

8304042001 6

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 31, 1983

Ronald E. Robertson, Esquire
Musick, Peeler and Garrett
Suite 1175, Ring Building
1200 Eighteenth Street, N.W.
Washington, D.C. 20036

Dear Mr. Robertson:

On May 24, 1983, the Commission determined that there is no probable cause to believe that your clients, Ronald Reagan and his authorized committees, violated 26 U.S.C. § 9012(b)(1). The Commission also determined that it will take no further action with regard to the alleged violation of 2 U.S.C. § 441a(f) by your clients.

Accordingly, the file in this matter has been closed and will become part of the public record within thirty days. Should you wish to submit any factual or legal materials to appear on the public record, please do so within ten days.

If you have any questions, please contact Anne A. Weissenborn at (202) 523-4175.

Sincerely,

Charles N. Steele
General Counsel

8304042001 7

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Ronald E. Robertson, Esquire
Musick, Peeler and Garrett
Suite 1175, Ring Building
1200 Eighteenth Street, N.W.
Washington, D.C. 20036

Dear Mr. Robertson:

On May 24, 1983, the Commission determined that there is no probable cause to believe that your clients, Ronald Reagan and his authorized committees, violated 26 U.S.C. § 9012(b)(1). The Commission also determined that it will take no further action with regard to the alleged violation of 2 U.S.C. § 441a(f) by your clients.

Accordingly, the file in this matter has been closed and will become part of the public record within thirty days. Should you wish to submit any factual or legal materials to appear on the public record, please do so within ten days.

If you have any questions, please contact Anne A. Weissenborn at (202) 523-4175.

Sincerely,

Charles N. Steele
General Counsel

9304042008

AW 5/27/83

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 31, 1983

Brice M. Clagett, Esquire
Counsel, North Carolina Congressional
Club, now the National Congressional Club
Covington and Burling
1201 Pennsylvania Avenue, N.W.
Washington, D.C. 20006

RE: MUR 1252/1299

Dear Mr. Clagett:

On May 24, 1983, the Commission determined that it will take no further action with regard to the violation of 26 U.S.C. § 9012(f) by the North Carolina Congressional Club, now the National Congressional Club.

Accordingly, the file in this matter has been closed and will become part of the public record within thirty days. Should you wish to submit any factual or legal materials to appear on the public record, please do so within ten days.

If you have any questions, please contact Anne A. Weissenborn at (202) 523-4175.

Sincerely,

Charles N. Steele
General Counsel

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Brice M. Clagett, Esquire
Counsel, North Carolina Congressional
Club, now the National Congressional Club
Covington and Burling
1201 Pennsylvania Avenue, N.W.
Washington, D.C. 20006

RE: MUR 1252/1299

Dear Mr. Clagett:

On May 24, 1983, the Commission determined that it will take no further action with regard to the violation of 26 U.S.C. § 9012(f) by the North Carolina Congressional Club, now the National Congressional Club.

Accordingly, the file in this matter has been closed and will become part of the public record within thirty days. Should you wish to submit any factual or legal materials to appear on the public record, please do so within ten days.

If you have any questions, please contact Anne A. Weissenborn at (202) 523-4175.

Sincerely,

Charles N. Steele
General Counsel

8304042002?0

AW 5/27/83

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 31, 1983

Jan W. Baran, Esquire
Counsel, Americans for Change
Baker and Hostetler
818 Connecticut Avenue, N.W.
Washington, D.C. 20006

RE: MUR 1252/1299

Dear Mr. Baran:

On May 24, 1983, the Commission determined that it will take no further action with regard to the violation of 26 U.S.C. § 9012(f) and with regard to the alleged violation of 2 U.S.C. § 441a by the Americans for Change ("AFC"). The Commission has also determined that there is no probable cause to believe that your client violated 2 U.S.C. § 432(e)(4).

Accordingly, the file in this matter has been closed and will become part of the public record within thirty days. Should you wish to submit any factual or legal materials to appear on the public record, please do so within ten days.

If you have any questions, please contact Anne A. Weissenborn at (202) 523-4175.

Sincerely,

Charles N. Steele
General Counsel

8304042002 1

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Jan W. Baran, Esquire
Counsel, Americans for Change
Baker and Hostetler
818 Connecticut Avenue, N.W.
Washington, D.C. 20006

RE: MUR 1252/1299

Dear Mr. Baran:

On May 24, 1983, the Commission determined that it will take no further action with regard to the violation of 26 U.S.C. § 9012(f) and with regard to the alleged violation of 2 U.S.C. § 441a by the Americans for Change ("AFC"). The Commission has also determined that there is no probable cause to believe that your client violated 2 U.S.C. § 432(e)(4).

Accordingly, the file in this matter has been closed and will become part of the public record within thirty days. Should you wish to submit any factual or legal materials to appear on the public record, please do so within ten days.

If you have any questions, please contact Anne A. Weissenborn at (202) 523-4175.

Sincerely,

Charles N. Steele
General Counsel

AW 5/27/83

8304042002 2

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 31, 1983

Robert R. Sparks, Jr., Esquire
Counsel, National Conservative Political
Action Committee
Sedam and Herge
8300 Greensboro Drive
McLean, Virginia 22102

RE: MUR 1252/1299

Dear Mr. Sparks:

On May 24, 1983, the Commission determined that it will take no further action with regard to the violation of 26 U.S.C. § 9012(f) and with regard to the alleged violation of 2 U.S.C. § 441a by the National Conservative Political Action Committee ("NCPAC"). The Commission has also determined that there is no probable cause to believe that your client violated 2 U.S.C. § 432(e)(4).

Accordingly, the file in this matter has been closed and will become part of the public record within thirty days. Should you wish to submit any factual or legal materials to appear on the public record, please do so within ten days.

If you have any questions, please contact Anne A. Weissenborn at (202) 523-4175.

Sincerely,

Charles N. Steele
General Counsel

8304042002?

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Robert R. Sparks, Jr., Esquire
Counsel, National Conservative Political
Action Committee
Sedam and Herge
8300 Greensboro Drive
McLean, Virginia 22102

RE: MUR 1252/1299

Dear Mr. Sparks:

On May 24, 1983, the Commission determined that it will take no further action with regard to the violation of 26 U.S.C. § 9012(f) and with regard to the alleged violation of 2 U.S.C. § 441a by the National Conservative Political Action Committee ("NCPAC"). The Commission has also determined that there is no probable cause to believe that your client violated 2 U.S.C. § 432(e)(4).

Accordingly, the file in this matter has been closed and will become part of the public record within thirty days. Should you wish to submit any factual or legal materials to appear on the public record, please do so within ten days.

If you have any questions, please contact Anne A. Weissenborn at (202) 523-4175.

Sincerely,

Charles N. Steele
General Counsel

AW 5/27/83

8304042002 4

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 31, 1983

Robert R. Sparks, Jr.
Counsel, Fund for a Conservative
Majority
Sedam and Herge
8300 Greensboro Drive
McLean, Virginia 22102

RE: MUR 1252/1299

Dear Mr. Sparks:

On May 24, 1983, the Commission determined that it will take no further action with regard to the violation of 26 U.S.C. § 9012(f) and with regard to the alleged violation of 2 U.S.C. § 441a by the Fund for a Conservative Majority ("FCM"). The Commission has also determined that there is no probable cause to believe that your client violated 2 U.S.C. § 432(e)(4).

Accordingly, the file in this matter has been closed and will become part of the public record within thirty days. Should you wish to submit any factual or legal materials to appear on the public record, please do so within ten days.

If you have any questions, please contact Anne A. Weissenborn at (202) 523-4175.

Sincerely,

Charles N. Steele
General Counsel

8304042002

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Robert R. Sparks, Jr.
Counsel, Fund for a Conservative
Majority
Sedam and Herge
8300 Greensboro Drive
McLean, Virginia 22102

RE: MUR 1252/1299

Dear Mr. Sparks:

On May 24, 1983, the Commission determined that it will take no further action with regard to the violation of 26 U.S.C. § 9012(f) and with regard to the alleged violation of 2 U.S.C. § 441a by the Fund for a Conservative Majority ("FCM"). The Commission has also determined that there is no probable cause to believe that your client violated 2 U.S.C. § 432(e)(4).

Accordingly, the file in this matter has been closed and will become part of the public record within thirty days. Should you wish to submit any factual or legal materials to appear on the public record, please do so within ten days.

If you have any questions, please contact Anne A. Weissenborn at (202) 523-4175.

Sincerely,

Charles N. Steele
General Counsel

AW 5/27/83

8304042006

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 31, 1983

William A. Long, Esquire
Latham, Watkins and Hills
1333 New Hampshire Avenue, N.W.
Washington, D.C. 20036

RE: MUR 1252/1299

Dear Mr. Long:

On May 24, 1983, the Commission determined that it will take no further action with regard to the violation of 26 U.S.C. § 9012(f) by Americans for an Effective Presidency ("AEP").

Accordingly, the file in this matter has been closed and will become part of the public record within thirty days. Should you wish to submit any factual or legal materials to appear on the public record, please do so within ten days.

If you have any questions, please contact Anne A. Weissenborn at (202) 523-4175.

Sincerely,

Charles N. Steele
General Counsel

8304042002 7

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

William A. Long, Esquire
Latham, Watkins and Hills
1333 New Hampshire Avenue, N.W.
Washington, D.C. 20036

RE: MUR 1252/1299

Dear Mr. Long:

On May 24, 1983, the Commission determined that it will take no further action with regard to the violation of 26 U.S.C. § 9012(f) by Americans for an Effective Presidency ("AEP").

Accordingly, the file in this matter has been closed and will become part of the public record within thirty days. Should you wish to submit any factual or legal materials to appear on the public record, please do so within ten days.

If you have any questions, please contact Anne A. Weissenborn at (202) 523-4175.

Sincerely,

Charles N. Steele
General Counsel

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AW
5/27/83

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Ronald Reagan	)	
Reagan/Bush Committee	)	
(aka Reagan General Election Committee)	)	MUR 1252/1299
Reagan for President Committee	)	
Americans for Change	)	
Americans for an Effective Presidency	)	
Fund for a Conservative Majority	)	
National Congressional Club	)	
National Conservative Political Action Committee	)	

8304042003

CERTIFICATION

I, Marjorie W. Emmons, Recording Secretary for the Federal Election Commission Executive Session on May 24, 1983, do hereby certify that the Commission took the following actions in MUR 1252/1299:

1. Decided by a vote of 5-1 to take no further action with regard to the violations of 26 U.S.C. §9012(f) by Americans for Change, Americans for an Effective Presidency, the Fund for a Conservative Majority, the National Congressional Club and the National Conservative Political Action Committee.

   Commissioners Elliott, Harris, McDonald, McGarry, and Reiche voted affirmatively for the decision; Commissioner Aikens dissented.

2. Decided by a vote of 5-0 to take no further action with regard to the alleged violations of 2 U.S.C. § 441a(a) by Americans for Change, the Fund for a Conservative Majority and the National Conservative Political Action Committee.

   Commissioners Elliott, Harris, McDonald, McGarry, and Reiche voted affirmatively for the decision: Commissioner Aikens abstained.

(Continued)

3. Decided by a vote of 5-0 to take no further action with regard to the alleged violations by Ronald Reagan and his authorized committees of 2 U.S.C. §441a(f).

   Commissioners Elliott, Harris, McDonald, McGarry, and Reiche voted affirmatively for the decision. Commissioner Aikens abstained on the vote.

4. Decided by a vote of 6-0 to find no probable cause to believe that Ronald Reagan and his authorized committees violated 26 U.S.C. § 9012(b)(1).

   Commissioners Aikens, Elliott, Harris, McDonald, McGarry and Reiche voted affirmatively for the decision.

5. Decided by a vote of 4-2 to find no probable cause to believe that Americans for Change, the Fund for a Conservative Majority, and the National Conservative Political Action Committee violated 2 U.S.C. § 432(e)(4).

   Commissioners Aikens, Elliott, McDonald, and McGarry voted affirmatively for the decision; Commissioners Harris and Reiche dissented.

6. Decided by a vote of 6-0 to close the file in this matter.

   Commissioners Aikens, Elliott, Harris, McDonald, McGarry, and Reiche voted affiramtively for the decision.

7. Decided by a vote of 6-0 to direct the Office of General Counsel to send the appropriate letters pursuant to the actions taken above.

   Commissioners Aikens, Elliott, Harris, McDonald, McGarry, and Reiche voted affirmatively for the decision.

Attest:

5/25/83
Date

Marjorie W. Emmons
Secretary of the Commission

8304042003O

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary

FROM: Office of General Counsel

DATE: May 19, 1983

SUBJECT: MUR 1252/1299 - General Counsel's Report

The attached is submitted as an Agenda document for the Commission Meeting of May 24, 1983

Open Session _____

Closed Session X

CIRCULATIONS		DISTRIBUTION	
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Information	[ ]	Status Sheets	[ ]
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Other	[ ]	Other (see distribution below)	[ ]

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SENSITIVE

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

BEFORE THE FEDERAL ELECTION COMMISSION

83 MAY 19 A 9: 51

Submitted Late

In the Matter of	)	
	)	
Ronald Reagan	)	
Reagan/Bush Committee	)	
(aka Reagan General	)	
Election Committee)	)	
Reagan for President Committee	)	
Americans for Change	)	MUR 1252/1299
Americans for an Effective	)	
Presidency	)	
Fund for a Conservative Majority	)	
National Congressional Club	)	EXECUTIVE SESSION
National Conservative Political	)	
Action Committee	)	MAY 24 1983

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On March 29, 1983, the Office of General Counsel forwarded to the respondents and the Commission briefs setting forth the positions of this Office on the issues involved in this matter.

In these briefs this Office recommends that the Commission find probable cause to believe that Americans for Change ("AFC"), Americans for an Effective Presidency ("AEP"), Fund for a Conservative Majority ("FCM"), the National Conservative Political Action Committee ("NCPAC"), and the National Congressional Club violated 26 U.S.C. § 9012(f) by making excessive independent expenditures in support of the 1980 Reagan campaign but that no further action be taken; that the Commission take no further action with regard to alleged violations of 2 U.S.C. § 441a(a) by AFC, NCPAC and FCM; that the Commission find no probable cause to believe that AFC, FCM and NCPAC violated 2 U.S.C. § 432(e)(4); that the Commission take no

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further action with regard to the alleged violation of 2 U.S.C. § 441a(f) by Ronald Reagan and his authorized committees; and that the Commission find no probable cause to believe that Ronald Reagan and his authorized committees violated 26 U.S.C. § 9012(b). AEP, FCM, NCPAC and the National Congressional Club have responded to the General Counsel's briefs. (Copies of responses attached).

II. LEGAL ANALYSIS

A. 26 U.S.C. § 9012(f)

In the response submitted on behalf of AEP, counsel for this committee states, "Because AEP's non-violation (of 2 U.S.C. § 9012(f)) was conclusively established in the Common Cause case, the legal doctrine of res judicata bars further litigative or administrative enforcement of § 9012(f) with respect to AEP's 1980 activities." (Attachment 1, page 2). On this basis, counsel argues that the Commission cannot find probable cause to believe that AEP violated Section 9012(f), even when no further action is contemplated. Counsel for FCM also interprets the district court's decision in Common Cause as a finding of no violation of this provision by his client.

AEP's argument is misleading in several respects. First, its "non-violation" was not "conclusively established" in Common Cause v. Schmitt, 512 F. Supp. 489 (D.D.C. 1980), affirmed by an equally divided Supreme Court, 455 U.S. 129 (1982); nor was FCM's. On the contrary, the district court explicitly found that

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"(t)he plain language of Section 9012(f) proscribes categorically the defendants' [AFC, AEP and FCM] planned expenditures." at 492. Therefore, AEP's, FCM's and AFC's violations of the statute are clear; in the same way, the identical nature of the independent expenditure activities of NCPAC and the National Congressional Club in support of the Reagan candidacy in 1980 places these two committees in violation of § 9012(f).

In addition the unconstitutionality and thus the unenforceablility of section 9012(f) have not been finally established. As was stressed in the memorandum from this Office to the Commission dated November 18, 1982, on enforcement of 26 U.S.C. § 9012(f), an affirmance by an equally divided Supreme Court of a decision of a lower court has no precedential effect. See Trans World Airlines v. Hardison, 432 U.S. 63 (1977); Neil v. Biggers, 409 U.S. 188 (1972); Ohio ex rel. Eaton v. Price, 364 U.S. 263 (1960); Hertz v. Woodman, 218 U.S. 205 (1910). Such an affirmance permits a particular decision of a lower court to stand as to the parties and facts involved in that specific case, but does not indicate that the Supreme Court has approved the reasoning of the lower court or even adjudged the result to be correct. Therefore, the constitutionality of 26 U.S.C. § 9012(f) has not been conclusively litigated and the provision remains a part of the statute.

Secondly, AEP's argument that res judicata bars both further litigation and further administrative action is erroneous.

8304042003 4

Section 9012(f) still stands as law. As was also noted in the November 18, 1982 memorandum from this Office, federal agencies are generally without the power or expertise to pass on the constitutionality of legislation. Spiegel, Inc. v. FTC, 540 F.2d 287, 294 (7th Cir. 1976). See also Johnson v. Robison, 415 U.S. 361, 368 (1974), Oestereich v. Selective Service System Local Board No. 11, 393 U.S. 233, 242 (1968) (Harlan, J., concurring); Engineer Public Service Company v. SEC, 138 F.2d 936, 952-53 (D.C. Cir. 1943), remanded per curiam with direction to dismiss as moot, 332 U.S. 788 (1947). There is therefore a serious constitutional question whether the Commission could decline to enforce the statute because doubt has been cast upon its constitutionality. Only the Supreme Court can make an ultimate determination as to the constitutionality of a statute and it has not done so with regard to Section 9012(f).

As to those respondents who were defendants in Common Cause, it is probable that the Commission could not bring suit successfully; as to those respondents who were not defendants, the Commission can decide in its discretion not to pursue particular enforcement actions beyond a finding of probable cause to believe. As the agency mandated to enforce all provisions of the Presidential Election Campaign Fund Act including Section 9012(f), the Commission cannot ignore facts which support findings of probable cause to believe that violations have occurred and can make administrative findings in this regard.

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Counsel for AEP also argues that the Commission cannot find probable cause to believe a violation has occurred unless further enforcement, including litigation, is contemplated. Counsel for NCPAC seems to be making the same argument when he states, "The Commission, if it adopts the General Counsel's recommendation will leave NCPAC in the position of having had entered against it a finding that it has violated a law that has been declared unconstitutional, without having had the opportunity to assert that constitutionality in its defense. The General Counsel's recommendation leaves the Commission as the only tribunal before which NCPAC can assert that defense." (Attachment 3, page 3; see also Attachment 2, page 3).

These arguments totally disregard the discretionary power of the Commission to determine whether and how far to pursue enforcement in particular instances. See, e.g., In re Federal Election Campaign Act Litigation, 474 F. Supp. 1044 (D.D.C. 1979), regarding investigative decisions. 2 U.S.C. § 437g(a)(4)(A)(i) clearly authorizes the Commission to determine that there is probable cause to believe that a respondent has violated 26 U.S.C. § 9012(f). This same provision also provides for a process of "conference, conciliation, and persuasion" following a finding of probable cause, the goal being a conciliation agreement rather than litigation. 2 U.S.C. § 437g(a)(6)(A) authorizes the Commission to institute a civil action for relief only in situations in which conciliation efforts have failed.

8304042003 6

See FEC v. NRA, 553 F. Supp. 1331 (D.D.C. 1983). There is, however, nothing in the statute compelling the Commission to seek a judicial remedy in the absence of a conciliation agreement. Thus, Commission findings of probable cause to believe do not necessarily constitute a "first step in the civil litigation process."

This Office recommends that the Commission find probable cause to believe that AFC, AEP, FCM, NCPAC and the National Congressional Club violated 26 U.S.C. § 9012(f) but take no further action as to these committees' 1980 activities.

B. 2 U.S.C. § 44la(a)

Counsel for FCM and NCPAC argues that the Commission should find no probable cause to believe that his clients violated 2 U.S.C. § 44la(a), rather than accept this Office's recommendation that no further action be taken. Counsel also argues that 2 U.S.C. § 437g appears to authorize only findings of probable cause and no probable cause. In the latter regard, it should be emphasized that 2 U.S.C. § 437g does not, in fact, address itself to findings of no probable cause or to the possibility of the Commission's taking no further action. Section 437g(a)(4)(A) deals with the steps following a Commission decision to find probable cause to believe; it does not either explicitly or implicitly prohibit other findings.

The investigation undertaken by this Office into the alleged violations of Section 44la(a) by FCM and NCPAC was extensive. The information produced during the investigation did not provide

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concrete evidence of cooperation and coordination between the authorized Reagan committees on one hand and FCM, NCPAC and AFC on the other. However, some evidence involving common vendors came to light which did raise the potentiality for such coordination, particularly the common employment of Arthur J. Finkelstein and Associates by the Reagan for President Committee, FCM and NCPAC, and of MediAmerica by the Reagan for President Committee, NCPAC and AFC. Additional avenues of investigation exist as regards these remaining questions; however, such further investigation could involve a substantial additional commitment of Commission resources. Given the outright denials by committee representatives and by Arthur J. Finkelstein that any coordination took place, it is doubtful that additional inquiries would prove fruitful.

Because enough questions have been raised in connection with the employment of certain common vendors by respondent committees and to the possibilities for coordination through these vendors and through more personal relationships, a finding of no probable cause to believe that violations of Section 441a(a) occurred would not accurately reflect the results of the investigation. It is also a valid use of the Commission's prosecutorial discretion to decline to pursue this issue further in view of the additional resources which such additional pursuit would require.

This Office recommends that the Commission take no further action with regard to the alleged violations of 2 U.S.C. § 441a(a) by AFC, FCM and NCPAC.

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C. 2 U.S.C. § 441a(f), 26 U.S.C. § 9012(b)(1) and 2 U.S.C. § 432(e)(4)

The briefs submitted by this Office contain discussions of alleged violations of the above statutory provisions. The respondents in this matter have not submitted statements or briefs with regard to these particular issues.

IV. RECOMMENDATIONS

1. Find probable cause to believe and take no further action with regard to the violations of 26 U.S.C. § 9012(f) by Americans for Change, Americans for an Effective Presidency, the Fund for a Conservative Majority, the National Congressional Club and the National Conservative Political Action Committee.

2. Take no further action with regard to the alleged violations of 2 U.S.C. § 441a(a) by Americans for Change, the Fund for a Conservative Majority and the National Conservative Political Action Committee.

3. Take no further action with regard to the alleged violations by Ronald Reagan and his authorized committees of 2 U.S.C. § 441a(f).

4. Find no probable cause to believe that Ronald Reagan and his authorized committees violated 26 U.S.C. § 9012(b)(1).

5. Find no probable cause to believe that Americans for Change, the Fund for a Conservative Majority, and the National Conservative Political Action Committee violated 2 U.S.C. § 432(e)(4).

6. Approve attached letters.

18 May 1983
Date

BY: Charles N. Steele
General Counsel

Attachments
1 - Response to General Counsel's brief by Americans for an Effective Presidency
2 - Response to General Counsel's brief by Fund for a Conservative Majority
3 - Response to General Counsel's brief by the National Conservative Political Action Committee
4 - Response to General Counsel's brief by the National Congressional Club
5 - Letters to respondents - 6

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Attachment 1

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April 15, 1983

03 APR 18 P3:47

Federal Election Commission
1325 K Street, N.W.
Washington, D. C. 20463

Attn: Mrs. Marjorie Emmons
Secretary of the Commission

Re: MUR 1252/1299

Gentlemen:

As counsel to and on behalf of Americans for an Effective Presidency ("AEP"), we are writing in response to a letter dated March 29, 1983 and accompanying brief dated March 28, 1983, that we have received from your general counsel, Charles N. Steele. In his letter, Mr. Steele explained that he had recommended that the Federal Election Commission ("Commission") "find probable cause to believe that a violation of 26 U.S.C. § 9012(f) occurred, but that no further action be taken in this regard." In his brief, Mr. Steele bases this recommendation upon the allegation that AEP, an independent multicandidate political committee, made excessive expenditures in support of Ronald Reagan's presidential candidacy in 1980. While we agree that the Commission should not, and indeed cannot, proceed further against AEP, we vigorously object to the recommendation that "probable cause to believe that AEP violated 26 U.S.C. § 9012(f) in 1980" be found. Instead, the Commission is required simply to dismiss MUR 1252/1299.

Neither further court action, nor further administrative findings, can be permitted concerning AEP. The general counsel's brief tellingly concedes that the United States Supreme Court has made the dispositive determination in Common Cause v. Schmitt,

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455 U.S. 129 (1982), that AEP could not constitutionally be found to have violated 26 U.S.C. § 9012(f) by its 1980 activities. In Common Cause, the Commission, was a plaintiff and AEP a defendant; the suit called upon the court to rule concerning the exact same set of facts addressed by the general counsel in his brief of March 28. In the Common Cause case, the Supreme Court affirmed by vote of an equally divided court the decision of the three-judge district court that § 9012(f) "fails to survive the strict scrutiny required by the First Amendment. The government interest to fight electoral corruption is insufficient, here as in Buckley, to justify what amounts to a direct limitation on political speech." Common Cause v. Schmitt, 512 F.Supp. 489, 501 (D.D.C. 1980). The three-judge district court granted judgment for AEP "on the grounds that § 9012(f) violates the Constitution." 512 F.Supp. at 503. As the general counsel admits at page 6 of his brief, the Supreme Court's affirmance of the district court's decision "effectively closes the civil litigation" concerning the application of § 9012(f) to the 1980 activities of the party defendants to that suit (including AEP).

Because AEP's non-violation was conclusively established in the Common Cause case, the legal doctrine of res judicata bars further litigative or administrative enforcement of § 9012(f) with respect to AEP's 1980 activities. As the general counsel points out, in his brief at page 7, "parties to a particular suit are barred from relitigating in a second action the same issues of fact involving the same parties which have been before a court in an earlier action, either again before the same court in which the initial suit was brought or before other courts of like or lesser jurisdiction." In Montana v. United States, 440 U.S. 147, 153 (1979), the United States Supreme Court applied the doctrine to the federal government, explaining:

> A fundamental precept of common-law adjudication, embodied in the related doctrines of collateral estoppel and res judicata, is that a "right, question or fact distinctly put in issue and directly determined by a court of competent jurisdiction . . . cannot be disputed in a subsequent suit between the same parties or their privies . . . . " Southern Pacific R. Co. v. United States, 168 U.S. 1, 48-49 (1897). Under res judicata, a final judgment on the merits bars further claims by parties or their privies based on the same cause of action.

See also Walsh v. International Longshoreman's Association, AFL-CIO, Local 799, 630 F.2d 864, 869 (1st Cir. 1980) (court refused to allow the National Labor Relations Board to pursue

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preliminary injunction action against the defendant union's labor practices, because another district court had denied the injunction); United States v. Sioux Nation of Indians, 518 F.2d 1298, 1305 (Ct. Cl. 1975) (Indian Claims Commission not allowed to decide claim already litigated between same parties in federal court action). Here, as in the cases referred to above, the Commission cannot relitigate AEP's activities alleged to be in violation of § 9012(f) in any forum.

Just as the Commission cannot relitigate AEP's alleged violation of § 9012(f), the doctrine of res judicata also bars administrative action toward finding such a violation, including making a finding of probable cause to believe such violation has been committed. No administrative agency or commission can lawfully reach any factual conclusion that contradicts the Supreme Court's final resolution of this case, whether or not such administrative determination constitutes or leads to litigation. As pointed out in Developments in the Law -- Res Judicata, 65 Harv. L. Rev. 818, 869 (1952), "[T]here are some situations in which identical causes of action are brought . . . in successive actions before a court and an agency. * * * [I]t cannot be argued in such cases that the agency should be able to reexamine the action of the court." Thus the Commission cannot take any action, administrative or judicial, to bring AEP within the scope of § 9012(f) because the Supreme Court has already decided that that statute cannot constitutionally be applied to AEP for its 1980 activities. In addition, even were administrative findings not barred by the Common Cause case, the scheme for enforcement of 26 U.S.C. § 9012(f), set forth in 2 U.S.C. § 437g, does not contemplate unilateral Commission findings of probable cause except insofar as they are designed to lead to an enforcement process whose centerpiece is the threat of litigation. Because litigation against AEP for violation of § 9012(f) in 1980 is barred by Common Cause, so is a Commission finding of probable cause, which is the first step in the civil litigation process.

Wholly apart from the absolute legal bar against further Commission action on MUR 1252/1299, it would be grossly unfair as a matter of equity for the Commission now to charge AEP with violation of § 9012, in the full knowledge that (1) the Supreme Court has already ruled that the statute cannot constitutionally be applied to AEP's 1980 activities, and (2) AEP would have no opportunity to dispel the aura of unlawfulness that such a finding would create.

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Finally, the general counsel's recommendation that the Commission make its decision "with regard to the violation of 26 U.S.C. § 9012(f) by Americans for an Effective Presidency" (emphasis supplied) is wholly objectionable. While the general counsel's recommendation refers to "the violation" of 26 U.S.C. § 9012(f), no tribunal has ever determined that AEP has violated any statute. Further, the provisions for enforcement of § 9012(f), set forth at 2 U.S.C. § 437g, nowhere empower the Commission itself to find that "a violation" has occurred. Indeed, the United States Supreme Court has already affirmed the three-judge court's unanimous determination that AEP cannot constitutionally be found to have violated 26 U.S.C. § 9012(f) in 1980. Accordingly, the Commission can make no finding of violation or of probable cause, and must as a matter of law dismiss MUR 1252/1299 without further comment or consideration.

Very truly yours,

William A. Long

William A. Long
of LATHAM, WATKINS & HILLS
Counsel to Americans for an
Effective Presidency

cc: Charles N. Steele, Esq.

8304042004 3

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Attachment 2

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THE SECRETARY

83 APR 25 P 1:35

April 19, 1983

Ms. Marjorie Emmons
Commission Secretary
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: MUR 1252/1299

Dear Ms. Emmons:

This letter is written on behalf of our client, Fund for a Conservative Majority ("FCM"), in response to the General Counsel's Brief to the Commission in this matter, dated March 25, 1983.

In that brief, the General Counsel has recommended that the Commission find no probable cause to believe as to the purported violation of 2 U.S.C. §432(e)(4). We have no dispute with that recommendation. We do, however, dispute the recommendation that the Commission take no further action with respect to the alleged violation of 2 U.S.C. §441a(a), and that a finding of probable cause to believe be entered, but that no further action be taken, as to the alleged violation of 26 U.S.C. §9012(f).

The Recommendation as to 2 U.S.C. §441a(a).

The General Counsel's investigation of the complaints filed by the Carter/Mondale Committee and Common Cause in this matter has spanned some two and one-half years, with no discernible result other than the expenditure of an extraordinary amount of time and taxpayers' money. There is no evidence whatsoever of prohibited coordination of expenditures between FCM and its agents, on the one hand, and any authorized Reagan Committee or its agents, on the other. The General Counsel's Brief does claim that an "opportunity" or potential for coordination existed

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because of the use by the Reagan campaign and FCM of certain common vendors; but no actual evidence of prohibited coordination was found.

If the General Counsel has found no evidence of a violation of 2 U.S.C. §441a(a) - and he admits in his Brief that he has found none; he relies solely on "presumptions of coordination" (p.55) - then the Commission should find no probable cause to believe that a violation of that law has occurred, and close the file. FCM and those representatives of the official Reagan campaign contacted by the office of General Counsel have all steadfastly denied any forbidden coordination; so, too, have the common vendors deposed in this matter. The General Counsel has found no more than the potential or an opportunity for coordination; and that based only on supposition and conjecture.

No evidence of unlawful coordination has been found because there is none. To recommend, as the General Counsel does, simply that no further action be taken, without a recommendation as to probable cause, does not do justice to FCM. In addition, such a recommendation, if adopted by the Commission, does not appear to be authorized by 2 U.S.C. §437g. That statute suggests that the only findings available to the Commission are "probable cause" or "no probable cause."

Moreover, there is an even more compelling reason why the Commission should not accept the recommendation of the General Counsel. The Commission is the agency charged by Congress with enforcement and, through its advisory opinion powers, interpretation of the Federal Election Campaign Act of 1971, as amended. As such, the public in general, and respondents in particular, look to it for intelligible guidance as to what is and is not permitted under the Act. The General Counsel's recommendation disserves the Commission's purpose, for it provides no guidance, either to FCM or to the public at large, as to what types of activities or relationships (social or commercial) are permitted under the Act. From the General Counsel's recommendation, no lessons can be gleaned as to what constitutes actionable or prohibited coordination under the Act.

So that respondent FCM, and the public at large, will know what is unlawful coordination and what is not, the Commission should find no probable cause to believe that FCM has violated the law on these facts. Such a finding is the only

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logical finding consistent with the General Counsel's determination that no actual evidence of prohibited coordination has been found.

The Recommendation as to 26 U.S.C. §9012(f).

In a lawsuit brought by the Commission against FCM, 26 U.S.C. §9012(f) was declared unconstitutional by a three-judge district court of the District of Columbia. That decision was affirmed by a 4-4 vote by the Supreme Court.

The Commission has lost the lawsuit it brought against FCM. Now, however, aware that it cannot successfully bring another action against FCM for its 1980 presidential election activities, the General Counsel nevertheless recommends that the Commission find that FCM violated the law, but recommends that nothing be done about it. The General Counsel should not be permitted to have it both ways. The enforceability of 26 U.S.C. §9012(f) has been decided against the Commission - at the very least for the 1980 election cycle, although we contend it has been decided for all elections thereafter, as well.

The Commission, if it adopts the General Counsel's recommendation, will leave FCM in the position of having had entered against it a finding that it has violated a law that has been declared unconstitutional by a federal court. The Commission should decline to enter a finding that FCM has violated the law, just as a three-judge district court (undisturbed by the Supreme Court) has already done with respect to FCM.

Moreover, the General Counsel's thinly-veiled threat that future independent expenditures by FCM in support of a publicly-financed candidate would be answered by Commission enforcement proceedings is even more insidious than his inconsistent recommendation that the Commission find that FCM violated the law but that the Commission should take no action. The General Counsel's threat is apparently intended to frighten FCM and others and discourage them from exercising their right to express their support of future presidential candidates through expenditures.

Whether or not the Supreme Court's affirmance has precedential effect, as a matter of judicial economy and sensitivity to the most effective means of spending what tax

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dollars are allocated to the Commission, no further Commission action with respect to enforcement of 26 U.S.C. §9012(f) should be taken. The constitutionality - and, hence, the enforceability - of that provision has been litigated and decided against the Commission. The Commission should enforce those provisions of the law that have not been determined to be unconstitutional, and should not indulge in a quixotic campaign to litigate again an issue already decided.

As a matter of equity, if for no other reason, the Commission should find no probable cause to believe that FCM has violated 26 U.S.C. §9012(f). A court has, and would again, so find in favor of FCM; this Commission should do so, as well.

Sincerely,

Robert R. Sparks, Jr.

cc: Ann Weissenborn

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Attachment 3

83 APR 18 P2:20

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April 18, 1983

Ms. Marjorie Emmons
Commission Secretary
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: MUR 1252/1299

Dear Ms. Emmons:

This letter is written on behalf of our client, National Conservative Political Action Committee ("NPCAC"), in response to the General Counsel's Brief to the Commission in this matter, dated March 25, 1983.

In that brief, the General Counsel has recommended that the Commission find no probable cause to believe as to the purported violation of 2 U.S.C. §432(e)(4). We have no dispute with that recommendation. We do, however, dispute the recommendation that the Commission take no further action with respect to the alleged violation of 2 U.S.C. §441a(a), and that a finding of probable cause to believe be entered, but that no further action be taken, as to the alleged violation of 26 U.S.C. §9012(f).

The Recommendation as to 2 U.S.C. §441a(a).

The General Counsel's investigation of the complaints filed by the Carter/Mondale Committee and Common Cause in this matter has spanned some two and one-half years, with no discernible result other than the expenditure of an extraordinary amount of time. There is no evidence whatsoever of prohibited coordination of expenditures between NCPAC and its agents, on the one hand, and any authorized Reagan Committee or its agents, on the other. The General Counsel's Brief does claim that an "opportunity" or potential for coordination existed because of the use by the Reagan campaign and NCPAC of certain common vendors; but no evidence of

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prohibited coordination was found. Similarly, the General Counsel has found no evidence of unlawful coordination, notwithstanding Mr. Dolan's social acquaintance, and perhaps even conversations, with certain members of, or consultants to, the official Reagan campaign.

If the General Counsel has found no evidence of a violation of 2 U.S.C. §441a(a) - and he admits in his Brief that he has found none - then the Commission should find no probable cause to believe that a violation of that law has occurred and close the file. NCPAC and those representatives of the official Reagan campaign contacted by the office of General Counsel have all steadfastly denied any forbidden coordination; so, too, have the common vendors deposed in this matter. The General Counsel has found no more than the potential or an opportunity for coordination; and that based only on supposition and conjecture.

No evidence of unlawful coordination has been found because there is none. To recommend, as the General Counsel does, simply that no further action be taken, without a recommendation as to probable cause, does not do justice to NCPAC. In addition, such a recommendation, if adopted by the Commission, does not appear to be authorized by 2 U.S.C. §437g. That statute suggests that the only findings available to the Commission are "probable cause" or "no probable cause."

Moreover, there is an even more compelling reason why the Commission should not accept the recommendation of the General Counsel. The Commission is the agency charged by Congress with enforcement and, through its advisory opinion powers, interpretation of the Federal Election Campaign Act of 1971, as amended. As such, the public in general, and respondents in particular, look to it for intelligible guidance as to what is and is not permitted under the Act. The General Counsel's recommendation disserves the Commission's purpose, for it provides no guidance, either to NCPAC or to the public at large, as to what types of activities or relationships (social or commercial) are permitted under the Act. No lessons can be gleaned from the General Counsel's recommendation as to what constitutes actionable or prohibited coordination under the Act.

So that respondent NCPAC, and the public at large, will know what is unlawful coordination and what is not, the Commission should find no probable cause to believe that NCPAC

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has violated the law on these facts. Such a finding is the only logical finding consistent with the General Counsel's determination that no evidence of prohibited coordination has been found.

The Recommendation as to 26 U.S.C. §9012(f).

Section 9012(f) has been declared unconstitutional by a three-judge district court of the District of Columbia. That decision was affirmed by a 4-4 vote by the Supreme Court. These decisions were rendered in an action brought by the Commission against political committees identical in all material respects to NCPAC, and concerning expenditures substantially the same as those incurred by NCPAC.

The Commission chose not to sue NCPAC in connection with its 1980 expenditures in support of Mr. Reagan's election campaign. The Commission lost the suits it did bring against other committees like NCPAC. Now, however, aware that it probably could not successfully bring an action against NCPAC, the General Counsel nevertheless recommends that the Commission find that NCPAC violated the law, but recommends that nothing be done about it. The General Counsel should not be permitted to have it both ways. The enforceability of 26 U.S.C. §9012(f) has been decided against the Commission - at the very least for the 1980 election cycle, although we contend it has been decided for all elections thereafter, as well.

The Commission, if it adopts the General Counsel's recommendation, will leave NCPAC in the position of having had entered against it a finding that it has violated a law that has been declared unconstitutional, without having had an opportunity to assert that unconstitutionality in its defense. The General Counsel's recommendation leaves the Commission as the only tribunal before which NCPAC can assert that defense. The Commission should decline to enter a finding that NCPAC has violated the law, just as a three-judge district court (undisturbed by the Supreme Court) has done with respect to others identically situated to NCPAC.

Moreover, the General Counsel's thinly-veiled threat that future independent expenditures by NCPAC in support of a publicly-financed candidate would be answered by Commission enforcement proceedings is even more insidious than his -

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inconsistent recommendation that the Commission find that NCPAC violated the law but that the Commission should take no action. The General Counsel's threat is apparently intended to frighten NCPAC and others and discourage them from exercising their right to express their support of future presidential candidates through expenditures.

Whether or not the Supreme Court's affirmance has precedential effect, as a matter of judicial economy and sensitivity to the most effective means of spending what tax dollars are allocated to the Commission, no further Commission action with respect to enforcement of 26 U.S.C. §9012(f) should be taken. The constitutionality - and, hence, the enforceability - of that provision has been litigated and decided against the Commission. The Commission should enforce those provisions of the law that have not been determined to be unconstitutional, and should not indulge in a quixotic campaign to litigate again an issue already decided.

As a matter of equity, if for no other reason, the Commission should find no probable cause to believe that NCPAC has violated 26 U.S.C. §9012(f). A court would not so find against NCPAC; this Commission should not do so, either.

Sincerely,

Robert R. Sparks, Jr.

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Attachment 4

COVINGTON & BURLING
1201 PENNSYLVANIA AVENUE, N. W.
P. O. BOX 7566
WASHINGTON, D. C. 20044

TELEPHONE
(202) 662-6000

WRITER'S DIRECT DIAL NUMBER
202/662-5316
202/662-5498

TWX: 710 822-0006 (CB WSH)
TELEX: 89-593 (COVLING WSH)
TELECOPIER: (202) 662-6291
CABLE: COVLING

April 13, 1983

Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: MUR 1252/1299

Dear Commissioners:

This is in response to the General Counsel's recommendation concerning the above-entitled MUR, that the Commission "find probable cause to believe that the National Congressional Club violated 26 U.S.C. § 9012(f) in 1980 but take no further action with regard to this particular violation." Acceptance by the Commission of the General Counsel's recommendation, in light of its prior determinations in this matter, would finally resolve this proceeding with respect to the National Congressional Club.

The National Congressional Club agrees that the Commission should take no futher action in MUR 1252/1299. Given the decision in FEC v. Americans For Change, 512 F. Supp. 489 (D.D.C. 1980), and the substantial passage of time without action by the Commission, any other result would be unwarranted and unconscionable. The National Congressional Club disagrees with the General Counsel's recommendation that the Commission find probable cause to believe that § 9012(f) was violated, and, as set forth in prior communications to the Commission in this matter, would urge that the Commission find no probable cause to believe that the National Congressional Club violated 26 U.S.C. § 9012(f).

It is inconceivable to us, particularly given the opinion in FEC v. Americans For Change, that the Commission would determine to pursue this matter further. The National Congressional Club fully reserves the right, however, if the Commission determines to take further action, to respond to the General Counsel's recommendation concerning the probable cause to believe finding and, in connection therewith, to pursue all available remedies.

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Finally, we reserve the right, should the National Congressional Club receive further indication that the Commission intends to enforce § 9012(f) prospectively, to pursue appropriate avenues of relief in connection therewith.

Respectfully submitted,

Brice M. Clagett
Scott D. Gilbert
Attorneys for
The National Congressional Club

SDG:lk

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Ronald E. Robertson, Esquire
Musick, Peeler and Garrett
Suite 1175, Ring Building
1200 Eighteenth Street, N.W.
Washington, D.C. 20036

Dear Mr. Robertson:

On , 1983, the Commission determined that there is no probable cause to believe that your clients, Ronald Reagan and his authorized committees, violated 26 U.S.C. § 9012(b)(1). The Commission also determined that it will take no further action with regard to the alleged violation of 2 U.S.C. § 441a(f) by your clients.

Accordingly, the file in this matter has been closed and will become part of the public record within thirty days. Should you wish to submit any factual or legal materials to appear on the public record, please do so within ten days.

If you have any questions, please contact Anne A. Weissenborn at (202) 523-4175.

Sincerely,

Charles N. Steele
General Counsel

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(15)

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Jan W. Baran, Esquire
Counsel, Americans for Change
Baker and Hostetler
818 Connecticut Avenue, N.W.
Washington, D.C. 20006

RE: MUR 1252/1299

Dear Mr. Baran:

On , 1983, the Commission determined that there is probable cause to believe that your client, Americans for Change ("AFC"), violated 26 U.S.C. § 9012(f) during the 1980 presidential election campaign, but that no further action will be taken as to this violation. The Commission has also determined that it will take no further action with regard to the alleged violation of 2 U.S.C. § 441a(a) by AFC and that there is no probable cause to believe that your client violated 2 U.S.C. § 432(e)(4).

Accordingly, the file in this matter has been closed and will become part of the public record within thirty days. Should you wish to submit any factual or legal materials to appear on the public record, please do so within ten days.

If you have any questions, please contact Anne A. Weissenborn at (202) 523-4175.

Sincerely,

Charles N. Steele
General Counsel

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

William A. Long, Esquire
Latham, Watkins and Hills
1333 New Hampshire Avenue, N.W.
Washington, D.C. 20036

RE: MUR 1252/1299

Dear Mr. Long:

On , 1983, the Commission determined that there is probable cause to believe that your client, Americans for an Effective Presidency ("AEP"), violated 26 U.S.C. § 9012(f) during the 1980 presidential election campaign, but that no further action will be taken as to this violation.

Accordingly, the file in this matter has been closed and will become part of the public record within thirty days. Should you wish to submit any factual or legal materials to appear on the public record, please do so within ten days.

If you have any questions, please contact Anne A. Weissenborn at (202) 523-4175.

Sincerely,

Charles N. Steele
General Counsel

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Robert R. Sparks, Jr.
Counsel, Fund for a Conservative
Majority
Sedam and Herge
8300 Greensboro Drive
McLean, Virginia 22102

RE: MUR 1252/1299

Dear Mr. Sparks:

On , 1983, the Commission determined that there is probable cause to believe that your client, the Fund for a Conservative Majority ("FCM"), violated 26 U.S.C. § 9012(f) during the 1980 presidential election campaign, but that no further action will be taken as to this violation. The Commission has also determined that it will take no further action with regard to the alleged violation of 2 U.S.C. § 441a(a) by FCM and that there is no probable cause to believe that your client violated 2 U.S.C. § 432(e)(4).

Accordingly, the file in this matter has been closed and will become part of the public record within thirty days. Should you wish to submit any factual or legal materials to appear on the public record, please do so within ten days.

If you have any questions, please contact Anne A. Weissenborn at (202) 523-4175.

Sincerely,

Charles N. Steele
General Counsel

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Robert R. Sparks, Jr.
Counsel, National Conservative Political
Action Committee
Sedam and Herge
8300 Greensboro Drive
McLean, Virginia 22102

RE: MUR 1252/1299

Dear Mr. Sparks:

On , 1983, the Commission determined that there is probable cause to believe that your client, the National Conservative Political Action Committee ("NCPAC"), violated 26 U.S.C. § 9012(f) during the 1980 presidential election campaign, but that no further action will be taken as to this violation. The Commission has also determined that it will take no further action with regard to the alleged violation of 2 U.S.C. § 441a(a) by NCPAC and that there is no probable cause to believe that your client violated 2 U.S.C. § 432(e)(4).

Accordingly, the file in this matter has been closed and will become part of the public record within thirty days. Should you wish to submit any factual or legal materials to appear on the public record, please do so within ten days.

If you have any questions, please contact Anne A. Weissenborn at (202) 523-4175.

Sincerely,

Charles N. Steele
General Counsel

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Brice M. Clagett, Esquire
Counsel, North Carolina Congressional
Club, now the National Congressional Club
Covington and Burling
1201 Pennsylvania Avenue, N.W.
Washington, D.C. 20006

RE: MUR 1252/1299

Dear Mr. Clagett:

On , 1983, the Commission determined that there is probable cause to believe that your client, the North Carolina Congressional Club, now the National Congressional Club, violated 26 U.S.C. § 9012(f) during the 1980 presidential election campaign, but that no further action will be taken as to this violation.

Accordingly, the file in this matter has been closed and will become part of the public record within thirty days. Should you wish to submit any factual or legal materials to appear on the public record, please do so within ten days.

If you have any questions, please contact Anne A. Weissenborn at (202) 523-4175.

Sincerely,

Charles N. Steele
General Counsel

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Steele

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OFFICE OF THE
COMMISSION SECRETARY

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 29, 1983

MEMORANDUM

SENSITIVE

TO : The Commission

FROM : Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

SUBJECT: MUR 1252/1299

Attached for the Commission's review are six briefs stating the positions of the General Counsel on the legal and factual issues involving six respondents in the above-captioned matter. Copies of these briefs and letters notifying the respective respondents of the General Counsel's intent to recommend to the Commission findings of probable cause to believe but no further action, and no probable cause to believe were mailed on March 29, 1983. Following receipt of the respondents' replies to these notices, this Office will make a further report to the Commission.

Attachments

Briefs - 6
Letters to respondents - 6

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COPIES OF BRIEFS SUBMITTED TO INDIVIDUAL RESPONDENTS ARE TO BE FOUND WITH OTHER MATERIALS RELATED TO SPECIFIC RESPONDENT COMMITTEES

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JMD

RNC STAFF TELEPHONE ROSTER

March 9, 1981

ACCOUNTING	Jay Banning	6755
ADMINISTRATION SERVICES DEPARTMENT	Neal Peden	6560
BLACK COMMUNITY INVOLVEMENT	Robert Wright	6520
BUILDING MANAGEMENT	Margaret Haas	6508
CHAIRMAN	DICK RICHARDS	6700
CITIZENS OPERATION	Dr. Fred Balitzer	7604
CO-CHAIRMAN	Betty Heitman	6735
COLLEGE REPUBLICANS	Richard Endres	6527
COMMITTEE CORRESPONDENCE	Pamela Stanard	6750
COMMUNICATIONS	Mark Tapscott	6614
COMPTROLLER	Jay Banning	6560
COMPUTER SERVICES	Ron Charnock	7670
CONCORD CONFERENCES	Lynn Smallpage	7650
CONVENTION	Josephine Good	6630
DEPUTY CHAIRMAN	Chuck Bailey	6600
DEPUTY CHAIRMAN	Fred Biebel	7590
DIRECT MAIL RESPONSE	Phil Smith	6643
ETHNIC/RELIGIOUS LIAISON	Don Shea	6556
FACILITIES	George Lewis	6534
FIELD OPERATIONS	Carol Whitney	6710
FIN[illegible]E DEPARTMENT	Jack Faris	6730
GOVERNOR'S ASSOCIATION	Ron Rietdorf	6620
GRAPHIC SERVICES	Liz Burke	6786
HOUSE COUNSEL	Don Ivers	6638
INFORMATION SERVICES	Donna Knecht	6790
LOCAL ELECTIONS		6585
NAT'L. FED. OF REPUBLICAN WOMEN	Kathleen Lawrence	6670
NAT'L. REP. HERITAGE GROUP	Joan Carroll	6760
OUTREACH PROGRAM	David Weinstein	6598
PERSONNEL	Judy DeLeo	6560
PHONE BANKS	Polly James	6577
PRESIDENTIAL LIAISON	Jack Kelly	6726
PRESS RELATIONS	Jennifer Hillings	6550
PUBLICATIONS	Barbara Gleason & Judy Van Rest	6688
RECEPTION DESK		6718
REDISTRICTING COMMITTEE	Maxene Fernstrom	6660
REP. NAT'L HISPANIC ASSEMBLY	Ileana Fresen	6569
RNC MEETINGS	Josephine Good	6630
SECURITY	Ernie Giordano	6718
SENIOR CITIZENS	Phil Guarino	6543
SPEAKER'S BUREAU	Sandy Riley	7590
TELEPHONE SERVICES	Fran Howle	-0-
YOUNG REPUBLICANS	Rosann Garber	6680

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RESOURCE LIST

Addresses of prominent Republicans	Information Services	6790
After Hours Access to Bldg	Ernie Giordano	6718
Airline Tickets:		
Air & Cruise Admin., Inc		628-8203
All In One Travel & Tour		544-8100
T. Bell Travel		554-9210
Davis Agency, Inc		521-5000
The Great Escape		783-2520
Air Travel Cards	Evelyn Slack	6756
Art Department	Bill Fleishell	6635
Bumper Stickers	Onis Johnson	6788
Capitol Hill Information		224-3121
Capitol Hill Club Lunch Cards	Pat Curtis	6700
Central Delivery	Acct. #15-222	589-8500
Chairman's Pictures and Bio	Pat Curtis	6700
Chairman's Report	Dave Turner	6700
Check Cashing	Eleanor Manuel	6757
Commonsense	Judy Van Rest	6688
Coffee	George Lewis	6534
Comptroller's Procedures Manual	Judy DeLeo	6560
Concord Conferences	Lynn Smallpage	7650
Congressional Campaign Comm		479-7000
Conference Room	Joyce Bathanazas	6536
Convention Information	Jo Good	6630
County Line	Andrew Gildea	6550
Delegate Selection	Jo Good	6630
Federal Express Airbills	Margaret Haas	6508
First Aid Supplies	Ruth Cannady	6656
First Monday	Barbara Gleason	6688
Heat & Air Conditioning	George Lewis	6534
House Republican Policy Comm		225-6168
ID Cards	Ernie Giordano	6718
Information Retrieval	Barbara Clark	7616
Insurance	Evelyn Slack	6756
Intern Program	Judy DeLeo	6560
International Visitors	Dave Turner	6700
Interviewing	Judy DeLeo	6560
Library	Helen Ammens	6626
Lists:		
RNC, Members of	Gail Griffith	6630
State Chairmen	Gail Griffith	6630
County Chairmen	Andrew Gildea	6550
Mailroom	Fred Hajmosi	6590
Messenger Service (outside bldg.)	George Lewis	6534
New Employees	Judy DeLeo	6560
Notary Public	Phil Guarino	6543
" "	Ruth Miller	7695
Office Fixtures:		
Phones	Margaret Haas	6508
Equip. (furn. & typewriters)	George Lewis	6534
Moving	George Lewis	6534

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Parking Spaces	Judy DeLeo	6560
Pay Checks, Questions Re:	Barbara Cherry	6560
Petty Cash	Eleanor Manuel	6757
Platforms	Donna Knecht	6790
Press Conferences	Jennifer Hillings	6550
Print Approval:		
Substantive	Mark Tapscott, Barry Beringer, Jennifer Hillings	6550
Routine	Margaret Haas	6508
Publications:		
The College Republican	Rick Endres	6527
Commonsense	Judy Van Rest	6688
County Line	Andrew Gildea	6550
First Monday	Barbara Gleason	6688
Advisory Council Statements	Onis Johnson	6788
Finance Newsletter	Finance	6730
For Which We Stand	Outreach	6598
GOP Nationality Letter	Heritage	6760
El Republicano	Hispanic Assembly	6769
Senior Republicans	Phil Guarino	6543
Turning Point	Angela Wright	7626
Purchase Orders	Lynn Bulow	6560
Rental Car Discounts	Hazel Pilvelait	6560
Republican Women's Federal Forum	Opal Kato	6537
Resumes	Judy DeLeo	6560
Schedule of Republican Events	Gail Griffith	6630
Senatorial Campaign Comm		224-2351
Senate Republican Policy Comm		224-2946
State Legislatures	Local Elections	6585
Stationery	Print Shop	6590
Student Lectures	Donna Knecht	6790
Survey	Suzanne Edwards	7666
Sustaining Membership Cards	Phil Smith	6643
Supplies	Onis Johnson	6788
TARS (Teenage Republicans)	Barbie Wells	631-9625
Telephone Credit Cards	Evelyn Slack	6756
Telephone Books (In & Out of Town)	Fran Howle	-0-
Tours	Donna Knecht	6790
Volunteer Assistance	Donna Knecht	6790
Withholding Tax Information	Judy DeLeo	6560
Word Processing	Ruth Cannady	6656
Xeroxing Paper	Onis Johnson	6788
Xerox Services	Joyce Bathanazas	6536

8304042006

CAIN, Jean	Direct Mail Response	7643
CANNADY, Ruth	Word Processing	6656
CARROLL, Patrick	Computer Services	7670
CARSTON, Gloria	Computer Services	7670
CATANOSO, Anthony	Local Elections	6585
CAUDILL, James	Facilities	6534
CHARNOCK, Leah	Direct Mail Response	6643
CHARNOCK, Ronald	Computer Services	7670
CHERRY, Barbara	Administration	6560
CLARK, Barbara	Public Affairs	7616
CLINGER, William, Jr	Direct Mail Response	7643
COBB, Donna	Public Affairs	7616
COHEN, Robert	Field Operations	6710
COLLINS, Lynn	Finance/PAC	6730
COOK, Ervin	Print Shop	6590
CORRY, Thomas	Public Affairs	7664
COUTARD, Hans	Facilities	6515
COVELLE, James	Computer Services	7670
COX, Cynthia	Local Elections	6585
COX, Lorraine	Conventions	6630
COYE, Wade	Production Department	7670
CRAWFORD, Tim	Presidential Liaison	6726
CUMMINGS, Becky	Field Operation	6710
CUMMINGS, Joe	Phone Bank	6577
CURTIS, Mary	Computer Services	7698
CURTIS, Pat	Chairman's Office	6700
DALTON, Bill A	Field Operations	6710
DAVENPORT, Joan M	Legal	6638
DAVIS, Richard	College Republicans	6527
DAVIS, Zelda	Public Affairs	6614
DE LEO, Judith	Personnel	6560
DE RHAM, William	Computer Services	7670
DEVCHAKIWSKY, Steve	Public Affairs	7662
DEYCHAK, Orest	Computer Services	7670
DIMITRIJEVICH, Maryann	Public Affairs	6550
DINEGAR, James	Direct Mail Response	6643
DIXON, Diana	Direct Mail Response	7643
DODD, Dixie	NFRW	6670
DOLLIFF, Phillip	Phone Bank	6577
DOUBRAVA, Richard J	Phone Bank	6577
DRIGGERS, Glen	Phone Bank	6577
DRUCKER, David	Computer Services	7670
DUDZIC, Max	Direct Mail Response	6643
DYER, William M	Facilities	6590
EASTMAN, Brian	Phone Bank	6577
EDWARDS, Lee A	Political Affairs	6600
EDWARDS, Susan	Public Affairs	7666
ELLIS, Julian E	Security	6719
ENDRES, Richard	College Republicans	6527
ERICKSON, Paul	College Republicans	6527
FAUSTINO, Acacio	Phone Bank	6577
FARIS, S. Jackson	Finance	6720
FENNELL, Pamela	Field Operations	6710

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FERNSTROM, Maxene.....Redistricting.....6660
FINERAN, Lawrence A.....Phone Bank.....6577
FISCHER, Andrea.....Field.....6710
FITZGERALD, Doug.....Public Affairs.....6650
FLEIG, Anne G.....Public Affairs.....7611
FLEISHELL, William.....Art & Copy.....6635
FLEURIVAL, Gisele.....Facilities.....6515
FRANCIES, Peggy.....Ethnic/Religious.....6556
FREEMAN, Wilma Lee.....Phone Bank.....6577
FRESEN, Ileana.....Hispanic Assembly.....6569
FRIDAY, Lisa.....Local Elections.....6585

GARBER, Rosann.....Young Republicans.....6680
GATES, Steven.....Public Affairs.....7664
GAYLORD, Molly.....Local Projects.....6585
GENSIOR, Catherine.....Legal.....6638
GIBBLE, Steve.....College Republicans.....6527
GILDEA, Andrew.....Public Affairs.....6550
GILLIN, Lisa.....Computer Services.....7670
GINYARD, Vera.....Direct Mail Response.....7643
GIORDANO, Ernie.....Security.....6718
GLASS, Diane.....Field Operations.....6710
GLEASON, Barbara.....Public Affairs.....6688
GOOD, Josephine L.....Convention.....6630
GORMLEY, Mike.....Phone Bank.....6577
GORTON, Linda.....Finance.....6730
GOSSMAN, Jean.....Phone Bank.....6577
GREENSPUN, Diane.....Direct Mail.....6643
GRIFFITH, Gail H.....Conventions.....6630
GUARINO, Philip A.....Senior Citizens.....6543
GUARINO, Sarah.....Senior Citizens.....6543
GUNTHARP, Robert.....Redistricting.....6660
GUZZETTA, Carol Joan.....Special Projects.....6585

HAAS, Margaret.....Building Management.....6508
HAJNOSI, Fred.....Mail Room.....6590
HALL, Eric.....Security.....6719
HAMIL, Susan.....Finance.....6720
HANSEN, Richard.....Public Affairs.....6650
HAUGEN, Marilyn.....Finance.....6730
HAWKINS, Jean B.....Political Affairs.....6602
HEINZE, Catherine.....Phone Bank.....6577
HEITMAN, Betty.....Co-Chairman.....6735
HELTON, Sharon.....Finance.....6730
HESS, Elizabeth W.....Public Affairs.....7662
HESS, Michael.....Redistricting.....6660
HETH, Marcus.....Computer Services.....7670
HILDENBRAND, Barbara.....Field Operations.....6710
HILLINGS, Jennifer.....Public Affairs.....6550
HINMAN, Anita.....Special Projects.....6585
HOBACK, Michael.....Redistricting.....6660
HOLLIMAN, Beth.....Computer Services.....7670
HOWARD, Adrienne.....Phone Bank.....6577
HOWE, Mary.....Finance/Eagles.....6730
HOWLE, Frances G.....Telephone..... -0-
HUBER, Lisa.....Finance.....6730
HUKARI, Harvey H.....Field Operations.....6710
HURTADO, Vic.....Reagan/Bush Committee.....7602

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IJAMS, Margaret	Public Affairs	7616
INGRAHAM, Russell	Phone Bank	6577
IRBY, Jacqueline S.	Field Operations	6710
IVERS, Donald	Legal	6638
JACKSON, Cheryl	Computer Services	7670
JAMES, Polly	Phone Bank	6577
JOHNSON, Beth	Direct Mail Response	6643
JOHNSON, Monica	Phone Bank	6577
JOHNSON, Onis	Campaign Materials/Supplies	6788
JOINER, Kenneth	Computer Services	7670
JONES, Wanda A.	Computer Services	7670
JURGELA, Elena	Heritage	6760
KATO, Opal	Rep. Women's Fed. Forum	6537
KAWIOR, Philip	Public Affairs	6650
KEARNS, Dick	Young Republicans	6680
KELLY, Elizabeth	Computer Services	7670
KELLY, Jack	Presidential Liaison	6726
KLUZ, Leonard M.	Computer Services	7670
KINSEY, Pam	NFRW	6670
KNECHT, Donna	Information Services	6790
KORNEGAY, Olivia	Deputy Chairman	6706
KORTEN, Anita	Deputy Chairman	7590
KROPP, Arthur	Direct Mail Response	7643
KUHN, Dee	Republicans Abroad	7677
KUKLA, Paul	Phone Bank	6577
LAVELLE, Martin	Direct Mail Response	6643
LEE, Ruth	Outreach Program	6598
LEVIN, Vivian	Outreach	6598
LEWIS, Carolyn	Reagan/Bush Committee	7601
LEWIS, George	Facilities	6534
LEWIS, Larry	Computer Services	7698
LEWIS, Marie	Computer Services	7670
LUBER, Helen	Heritage	6760
LUSIAN, Carol	Local Elections	6585
MACKENZIE, Scott	Reagan/Bush Committee	7600
MADDOX, Evonne	Public Affairs	6550
MAFFEO, Kathie	College Republicans	6527
MAGRUDER, Melanie D.	Phone Bank	6577
MALONE, Junius	Print Shop	6590
MAMAIS, Nicholas	Field Operations	6710
MANKIN, Margaret	Finance	6730
MANUEL, Eleanor	Accounting	6757
MAURY, Melinda	Political Affairs	6600
MCBRIDE, Richard	Field Operations	6710
MCCANTZ, Lynn	Department D	6727
MCCENEY, Joseph	Direct Mail Response	6643
MCCULLY, Elizabeth	Phone Bank	6577
MCDANIEL, Charlotte	Phone Bank	6577
MCDOUGALL, Colleen	Phone Bank	6577
MCGUIRE/FOY, Cindi	Legal	6638
MCMANUS, Wm. J.	Treasurer	6730
MCNEILL, John	Black Community Invol	6520
MERRILL, Paula Jo	Presidential Liaison	6726

MIDDLETON, Johnny.....Mail Room.....6590
MIDDLETON, Maurice.....Print Shop.....6590
MILLER, Charles.....Phone Bank.....6577
MILLER, Ruth.....Senior Citizens.....7695
MILLER, Suzanne.....Phone Bank.....6577
MILLS, Jasper.....Security.....6719
MONK, Eva.....Phone Bank.....6577
MONROE, Charles.....Print Shop.....6590
MOODY, Elizabeth.....Senior Citizens.....6543
MOONEY, Christine.....Phone Bank.....6577
MORIARTY, Joe.....Computer Services.....7693
MORRIS, Mary.....Presidential Liaison.....6726
MOSER, Dorothy.....Direct Mail Response.....7643
MULLER, David.....Political Affairs.....6600

NEAL, Sandra.....Computer Services.....7670
NEWHOUSE, Neil.....Local Elections.....6585
NIMMER, Ann.....Direct Mail Response.....7643

OAXACA, Fernando.....Hispanic Assembly.....6569
O'BRIEN, Kate.....Direct Mail Response.....7643
O'CONNOR, M. Emily.....Local Elections.....6585
O'DWYER, Mary.....Finance.....6730
O'LEARY, Janie.....Computer Services.....7670
O'LEARY, John.....Computer Services.....7670
OPEKA, Linda.....Local Elections.....6585
OSBERGER, Mary J.....Computer Services.....7670
OUTLAN, Wyeth.....Phone Bank.....6577

PALLA, Steven.....Phone Bank.....6577
PATOVANO, Elena.....Correspondence.....6752
PEDEN, Neal.....Administration.....6560
PETERSON, Drew.....Phone Bank.....6577
PHELPS III, Harold.....Phone Bank.....6577
PIERCE, Miriam.....Phone Bank.....6577
PILAVELAIT, Hazel.....Administrative Service.....6560
PIPPETTS, Leslie.....Phone Bank.....6577
PITTMAN, Judy.....Governors.....7690
POLLARD, Robert.....Computer Services.....7670
POTTER, John.....Phone Bank.....6577
POWELL, Cam.....Special Projects.....6585
POWELL, Patricia.....Public Affairs.....6688

QUA, Sara.....Direct Mail Response.....6643

RADEWAGEN, Fred.....Governor's Association.....6620
RAMBAUT, Sandra.....Finance/Administration.....6730
RENDEL, Betty.....NFRW.....6670
RHODES, Wilhelmina.....Telephone..... -0-
RICHARDSON, Ronald.....Computer Services.....7670
RICHMAN, Shelley.....Public Affairs.....7664
RIETDORF, Ron.....Governor's Association.....6620
RILEY, Sandy.....Speakers' Bureau.....7590
ROBERTS, Keith.....Computer Services.....7670
ROBINSON, Will.....Phone Bank.....6577
RODGERS, Joe.....Finance Chairman.....6730
ROOTS, Vincent.....Phone Bank.....6577

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ROSS, Lori.....Phone Bank.....6577
ROSSIE, Barrett.....College Republicans.....6527
RUZZO, Priscilla.....Phone Bank.....6577

SANGSTER, Richard.....Public Affairs.....7612
SAWYER, Michael.....Public Affairs.....7616
SCHNEIDER, Mindy.....Presidential Liaison.....6726
SCHULER, Nancy.....Public Affairs.....7662
SCHROTE, Rachel D.....Correspondence.....6750
SCOTT, Frances.....Public Affairs.....6650
SHALIT, Beth.....Computer Services.....7670
SHEA, Donald.....Ethnic/Religious.....6556
SHEARER, Steven.....Phone Bank.....6577
SHEPARD, Lois.....Republicans Abroad.....7677
SHINABERRY, Roy.....Field Operations.....6710
SHUTT, James.....Phone Bank.....6577
SIRIANNI, Susan.....Redistricting.....6660
SIMMONS, Katherine.....Young Republicans.....6680
SLACK, Evelyn.....Accounting.....6756
SMALLPAGE, Lynn.....Concord Conference.....7650
SMITH, Edwin J.....Senior Citizens.....6543
SMITH, Philip S.....Direct Mail Response.....6643
SOKOLOWSKI, Stanley.....Computer Services.....7670
SOLER-SALA, Victor Jose.....Phone Bank.....6577
STANARD, Pamela.....Correspondence.....6750
STANSBURY, Lynda.....NFRW.....6670
STEARS, Robert.....Local Elections.....6585
STEUART, Guy.....Public Affairs.....7612
STEVENS, John.....Field Operations.....6710
STEVENSON, Jocelyn.....Phone Bank.....6577
STEWART, Diane.....Chairman's Office.....6700
SUAREZ, Joseph.....Phone Bank.....6577

TALBERT, Nell.....NFRW.....6670
TALENTA, Tania.....Republicans Abroad.....7677
TAPSCOTT, Mark.....Communications.....6614
TAYLOR, Betty Sue.....Finance/Eagle.....6730
TAYLOR, Deborah.....Computer Services.....6784
THAWLEY, Nancy B.....PAC Finance.....6730
THROWER, Roper.....Phone Bank.....6577
TIERNEY, Brian.....Local Elections.....6585
TINSLEY, Mary.....Local Elections.....6585
TOLAND, Judy.....Correspondence.....6750
TOMS, Jr., Leigh.....Computer Services.....7698
TYSER, Kimberly.....Direct Mail Response.....6643

VALENTINE, Jerry.....Computer Services.....7698
VAN REST, Judy.....Public Affairs.....6688
VELLEK, Dana.....Computer Services.....7670
VIRTA, Kay.....Public Affairs.....7616
VON BORSIG, Patricia.....Governor's Association.....6620
VRIEZELAAR, Rebecca.....Direct Mail Response.....7643

WAGNER, Carol.....Direct Mail Response.....6643
WALDMAN, Ben.....Citizens' Operations.....7604

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WARRINGTON, Russell (Rusty)	Field Operations	6710
WAYNE, John	Phone Bank	6577
WEBB, Sandra	College Republicans	6527
WELCH, Rita	Direct Mail Response	6643
WEINSTEIN, H. David	Outreach	6598
WHITE, Annette	Phone Bank	6577
WHITEHEAD, Margaret	Citizens' Operation	7604
WHITNEY, Carol A.	Field Operations	6710
WILLIAMS, Anthony	Facilities	6534
WILLIAMS, Ron	Phone Bank	6577
WILKS, Jewel	Deputy Chairman	7590
WOODDELL, Phyllis	Public Affairs	6550
WORKMAN, Anita	Local Elections	6585
WOYTASSEK, Janet	Computer Services	7670
WRIGHT, Angela	Public Affairs	7626
WRIGHT, Robert	Black Community Invol.	6520
ZENEL, Susan	Art & Copy	6635

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Republican
National
Committee

Donald L. Ivers
House Counsel

RESPONSE TO SUBPOENA TO PRODUCE DOCUMENTS AND MATERIALS
AND ORDER TO ANSWER WRITTEN QUESTIONS

TO:

Chairman, Federal Election Commission
1325 K Street, N. W.
Washington, D. C. 20463

RE: MUR 1252 (80)

8304042007

The Republican National Committee, by and through its Counsel, and in response to Federal Election Commission "Subpoena to Produce Documents and Materials and Order to Answer Written Questions," profers the information set forth below. Additionally, and preliminarily, the Republican National Committee would respectfully direct the attention of this Commission to rules adopted by the 1980 Republican National Convention on July 15, 1980, at Detroit, Michigan, a copy of which is attached hereto as Exhibit A. In referring to those Rules, it should be noted that, in the Preamble to those Rules, it is stated that the Rules are adopted as "the Rules for the election and government of the Republican National Committee . . . " [emphasis supplied]. Further, at Rule 19(a), it is stated that "(t)he Republican National Committee shall have the general management of the Republican Party in the United States, the District of Columbia, Guam, Puerto Rico, and the Virgin Islands . . . " And, further, at Rule 24(a), it is stated that "(t)he national committee shall issue the call for the next national convention to nominate candidates for President and Vice President of the United States . . . " And, finally, at Rule 27, it is stated that "(t)he national committee shall have the power to declare vacant the seat of any member who refuses to support the Republican nominees for President and/or Vice President."

The recitation of the Rules as set forth in the preceding paragraph is simply to emphasize the position of the Republican National Committee that one of its principal duties and responsibilities is to support the Republican nominee for the office of President of the United States. Thus, a substantial portion of the efforts of the Republican National Committee and its staff during a Presidential election year is related, directly or indirectly to, in the case of the 1980 campaign, "Ronald Reagan's nomination as the Republican candidate for President or Ronald Reagan's general election campaign for President." [Quotation from Federal Election Commission Subpoena to Produce Documents and Materials and Order to Answer Written Questions.]

In light of the above, the Republican National Committee has attempted to be as specific as possible in the compilation of the materials requested

by the Commission's subpoena. It is, however, respectfully submitted that, broadly interpreted, the Commission's "Subpoena to Produce Documents and Materials and Order to Answer Written Questions" becomes little more than a request by the Commission to embark on a "fishing expedition" through the files and records of the Republican National Committee without regard to relevance or materiality.

With the discussions set forth above in mind, the following information is submitted:

I. SUBPOENA TO PRODUCE DOCUMENTS AND MATERIALS: the specific requests and the response thereto are set forth, seriatim, below:

Question 1: All documents and materials concerning meetings, discussions, correspondence, or other communications between the RNC and any of the following persons or organizations or their officials, employees, staff members, volunteers, organizers, or agents which relate in any way to the efforts of the RNC or the below listed organizations or individuals with respect to Ronald Reagan's nomination as the Republican candidate for President or Ronald Reagan's general election campaign for President in 1980:

Reagan for President Committee
Reagan General Election Committee
1980 Republican Presidential Unity Committee
Reagan-Bush Committee
Reagan for President Compliance Fund
Ruth Jones, Ltd.
Bailey, Deardourff & Associates, Inc.
Fund for a Conservative Majority
Citizens for Reagan in 1980
North Carolina Congressional Club
Americans for Reagan
National Conservative Political Action Committee
The Ronald Reagan Victory Fund
Americans for Change
Reagan for President in '80
Americans for an Effective Presidency
Anna Chennault
Stuart Spencer
Senator Jesse Helms
James Lake

Answer: The documents and materials requested herein, insofar as they exist with respect to the Republican National Committee, shall be produced for inspection, by prior agreement, at the offices of the Republican National Committee, on Thursday, April 9, 1981.

Question 2: All documents and materials relating to the contractual or professional relationship or any other association from January 1980 to

8304042007?

present, between the RNC and the following entities, their agents, officers, or employees undertaken in connection with efforts on the part of the RNC which relate in any way to Ronald Reagan's general election campaign for President in 1980 or which would aid in the defeat of any other 1980 Presidential candidate.

Bailey, Deardourff and Associates, Inc.
Diversified Direct, Inc.
Wiland and Associates
Telepost
Arthur Finkelstein and Associates
Bedford Printing
Ruth Jones, Ltd.

Answer: The documents and materials requested herein, insofar as they exist with respect to the Republican National Committee, shall be produced for inspection, by prior agreement, at the offices of the Republican National Committee, on Thursday, April 9, 1981.

Question 3: All telephone bills and/or other records of telephone calls made or received by the RNC from May, 1980 to the present.

Answer: The documents and materials requested herein, insofar as they exist with respect to the Republican National Committee, shall be produced for inspection, by prior agreement, at the offices of the Republican National Committee, on Thursday, April 9, 1981.

II. WRITTEN QUESTIONS (Interrogatories):

Question A: Please identify all officers, directors, employees, staff members, media time buyers, volunteers, consultants, advisory council members or other agents of the RNC from September 1979 to the present. With respect to each individual identified, please identify that person's supervisor.[1]

(1) Please identify which of the above individuals has and any other individuals who have participated in any way, directly or indirectly, in the oral or written authorization (express or implied) of any RNC expenditures which relate in any way to Ronald Reagan's general election campaign for President in 1980 or which would aid in the defeat of any other 1980 Presidential candidate.

(2) Please identify which of the above individuals and any other individuals who have participated in any way, directly or indirectly, in the production, conception, drafting, writing, editing, approval, review, presentation, printing, publication, distribution or dissemination of documents and materials which relate in any way to Ronald Reagan's campaign election for President in 1980, or which would aid in the defeat of any other Presidential candidate in 1980.

---

[1] In lieu of identifying the supervisor of each individual identified, in response to interrogatory A, RNC may provide the Commission with an organizational chart.

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Answer A: Rosters of the officers, employees and Advisory Council Members shall be provided to representatives of the Office of General Counsel at the same time as other documents and materials are produced for inspection on April 9, 1981. Employees and staff members are the same. Accurate records with respect to volunteers are not maintained as the term "volunteers" may be applied to literally thousands of individuals who assist, in one way or another, the Republican National Committee, or its employees, in connection with the various activities of the Republican National Committee throughout the United States. With respect to consultants, copies of consulting contracts covering the period in question shall be made available to representatives of the Office of General Counsel on April 9, 1981.

Answer A (1): The Chairman of the Republican National Committee, as the Chief Executive Officer of the Republican National Committee, had direct responsibility for any authorization of Republican National Committee expenditures of those funds authorized pursuant to 2 USC §441(a)(d)(2).

Answer A (2): Primary responsibility for the production, conception, drafting, writing, editing, approval, review, presentation, printing, publication, distribution or dissemination of all publications and other materials emanating from the Republican National Committee rest with the Director of the Public Affairs Department of the Republican National Committee, but under the authority of the Chairman of the Republican National Committee. The efforts of the entire staff of the Public Affairs Department of the Republican National Committee are directed toward these efforts.

Question B: List the phone numbers and extensions used by RNC from May, 1980 to the present, noting the extensions assigned to or used by each person identified in response to interrogatory A.

Answer B: Telephone rosters for the period in question will be provided to representatives of the Office of General Counsel on April 9, 1981.

Question C: List by date and location all fundraisers held by RNC since May, 1980 which related in any way to the election of Ronald Reagan as the President in 1980 or which related in any way to the defeat of any other 1980 Presidential candidate.

Answer C: Prelude to Victory Dinners, September 30, 1980, were held in the following cities:

Atlanta, Georgia
Boston, Massachusetts
Cleveland, Ohio
Cincinnati, Ohio
Denver, Colorado
Detroit, Michigan
Honolulu, Hawaii
Kansas City, Missouri
Los Angeles, California
Nashville, Tennessee
New York, New York
Oklahoma City, Oklahoma
Philadelphia, Pennsylvania
St. Louis, Missouri
San Francisco, Californi
Tulsa, Oklahoma
Washington, D. C.
Wichita, Kansas

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Question D: With respect to each individual identified in response to interrogatory A, please note whether that individual has had any past, or has any present association, either by way of employment, position, or membership with any of the below listed organizations, projects, or companies. With respect to each such association, note the dates during which each such person was so associated, with position(s) held with each.

Americans for Change
Reagan for President in '80
Americans for an Effective Presidency
Fund for a Conservative Majority
Citizens for Reagan in '80
The Republican Party
The Reagan for President Committee
Group '80
1980 Republican Presidential Unity Committee
Citizens for the Republic
Richard A. Viguerie Co., Inc.
Arthur J. Finkelstein & Associates
Ruth Jones, Ltd.
Bruce Eberle Associates, Inc.
Decision Making Information, Inc.
Bailey, Deardourff & Associates, Inc.
Citizens for the Republic
North Carolina Congressional Club
Americans for Reagan
National Conservative Political Action Committee
The Ronald Reagan Victory Fund
Committee for Independent Expenditures for Republicans
Target 80
The Conservative Coalition
The Conservative Caucus
Reagan 80
1980 United Republican Committee
Commitment 80

Answer D: To the best knowledge of the Republican National Committee, all individuals identified in response to Question A have "had any past, or has any present association, either by way of employment, position, or membership . . . " with the Republican Party. With respect to the other organizations listed herein, the past or present association of those individuals identified in Answer A is unknown.

Respectfully submitted,

Donald L. Ivers

DLI:jd
Enclosure

April 1981

8304042007 5

Republican
National
Committee

Michael E. Baroody
Director of Research

December 1, 1980

Mark -
Here is our response.
Let me know if
there is anything
else to add.
B.

TO: ALL MEMBERS OF THE PUBLIC AFFAIRS STAFF

FROM: BARRY BERINGER, COORDINATOR OF RESEARCH

RE: D.N.C v. R.N.C.

Pursuant to a court order in the above captioned case, we have been asked to produce all written communications of whatever sort with the Reagan/Bush Committee and other groups and persons listed in the attached memorandum.

Please read the attached memorandum with great care and give Xerox copies of all such material so listed in the attached to Phyllis Wooddell by close of business Wednesday, December 3rd.

If you have any questions concerning the above, please see me.

8304042007S

CAMPAIGN 80

135 WEST 50TH STREET, NEW YORK, NY 10020, TELEPHONE (212) 664-0700
901 SOUTH HIGHLAND STREET, ARLINGTON, VA 22204, TELEPHONE (703) 685-3400

November 25, 1980

Ms. Katherine Anderson
Deputy Chairman
Republican National Committee
310 First Street, S.E.
Washington, D.C. 20003

Dear Ms. Anderson:

Peat, Marwick, Mitchell & Co., 1990 K Street, N.W., Washington, D.C. 20006, are making an examination of our financial statements, and we shall be obliged, therefore, if you would confirm directly to them the following information concerning payments made by the Republican National Committee on behalf of Campaign '80, Inc.

	Amount	Invoice #	Invoice Date
William Carruthers Co.			
	$ 50,000. ✓	006	10/1/80
Newspaper Advertising Bureau, Inc.			
	$ 500,000. ✓	6018	10/9/80
	250,000.	6019	10/9/80
	150,000.	6020	10/9/80
	100,000.	6021	10/9/80
Total	$1,000,000.		
SFM Media Service Corporation			
	$ 175,000.		10/6/80
D'Arcy-MacManus & Masius, Inc.			
	$ 37,500.	210030	10/1/80
	37,500.	210029	10/10/80
Total	$ 75,000.		

Sincerely,

John Pasquali
Controller

The above information is correct except as noted on the reverse side of this letter.

Signed:_____ Title:_____ Date:_____

ADVERTISING AGENCY FOR REAGAN BUSH COMMITTEE

8304207?

Republican
National
Committee

November 21, 1980

To: Don Ivers

From: Barbara Hildenbrand

Subject: Voter Programs, state activities

In New Hampshire we mailed out at RNC expenses an advocacy letter for the Republican party. This letter was signed by Ronald Reagan. Contact between the RNC and Reagan campaign was limited to their approving the content of the letter and providing permission to use his signature. Letter enclosed.

8304042007

Republican
National
Committee

Michael E. Baroody
Director of Public Affairs

November 21, 1980

TO: ED MEESE

FROM: MIKE BARODY Mike

RE: THANK YOU MESSAGE TO REAGAN VOLUNTEERS

Attached is the draft of the thank you message from Governor Reagan to the campaign volunteers. Bill Brock has read it, approved it, and asked me to forward it to you. Please contact me if we can be of further assistance.

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Republican
National
Committee

031000

November 21, 1980

THANK YOU LETTER TO ALL VOLUNTEERS

Dear

This past November all of us shared in a great victory. It was a victory that represented the culmination of many months, indeed many years, of hard work and selfless effort by thousands of individuals nationwide.

Speaking for both Nancy and myself, I wish you to know that both of us appreciate the countless hours and tireless efforts that you and your fellow volunteers devoted to the campaign. Everywhere we went these past months we saw the results of your efforts.

Often times, yet far less often than we had hoped, we were able to meet our volunteers personally. The spirit and enthusiasm we encountered were overwhelming and a constant source of personal support throughout the campaign. For all the warmth and affection, we thank you.

We must now begin the task of meeting the challenges we face as a people and as a nation. We want to and we will, move America ahead. In this process we will leave no one behind. During the campaign I promised that the bounty of America will be shared by all our people. Thanks to your efforts it will be.

Again, on behalf of Nancy and myself -- thank you for all you have done.

With warmest personal regards.

RONALD REAGAN

8304042009C

MEMORANDUM

republican national committee

TO: DON IVERS

FROM: PHIL SMITH, Direct Mail

DATE: NOVEMBER 21, 1980

RE: FEC DOCUMENT REQUEST

Attached are all documents and materials relating to the organizations and committees reguested in your memo of Nov. 18th.

If you have any questions concerning these documents, please call.

cc: Jack Faris

83040420081

Republican
National
Committee

Donald L. Ivers
House Counsel

E. Mark Braden
Deputy House Counsel

November 18, 1980

TO: All Department Directors

FROM: House Counsel DLI

RE: FEC Document Request

8304042003C

The RNC has been ordered to produce all documents and materials described below. Production must be made as soon as possible. Production was originally requested prior to November 4, but was postponed as a result of our motion. An individual from each division in your department should be assigned responsibility for identification and segregation of any documents and materials falling within the categories set forth below. That individual should contact Carol or Catherine Gensior in my office immediately to coordinate a review of the materials and preparation for making the materials available for examination by FEC attorneys. Production must be completed not later than December 1.

The documents and materials requested are as follows:

Please produce in their entirety the following:

1. All documents and materials concerning meetings, discussions, correspondence, or other communications between the RNC and any of the following persons or organizations or their officials, employees, staff members, volunteers, organizers, or agents which relate in any way to the efforts of the RNC or the below listed organizations or individuals with respect to Ronald Reagan's

nomination as the Republican candidate for President or Ronald Reagan's general election campaign for President in 1980:

Reagan for President Committee
Reagan General Election Committee
1980 Republican Presidential Unity Committee
Reagan-Bush Committee
Reagan for President Compliance Fund
Ruth Jones, Ltd.
Bailey, Deardourff & Associates, Inc.
Fund for a Conservative Majority
Citizens for Reagan in 1980
North Carolina Congressional Club
Americans for Reagan
National Conservative Political Action Committee
The Ronald Reagan Victory Fund
Americans for Change
Reagan for President in '80
Americans for an Effective Presidency
Anna Chennault
Stuart Spencer
Senator Jesse Helms
James Lake

2. All documents and materials relating to the contractual or professional relationship or any other association from January 1980 to present, between the RNC and the following entities, their agents, officers, or employees undertaken in connection with efforts on the part of the RNC which relate in any way to Ronald Reagan's general election campaign for President in 1980 or which would aid in the defeat of any other 1980 Presidential candidate.

Bailey, Deardourff and Associates, Inc.
Diversified Direct, Inc.
Wiland and Associates
Telepost
Arthur Finkelstein and Associates
Bedford Printing
Ruth Jones, Ltd.

3. All telephone bills and/or other records of telephone calls made or received by the RNC from May, 1980 to the present.

If you have any questions, please call. Your full cooperation is needed and appreciated.

8304042008 3

Republican
National
Committee

Donald L. Ivers
House Counsel

E. Mark Braden
Deputy House Counsel

Don — Invoices attached.

GB - Copy all invoices made out to listed vendors + deliver to me on 12-1-80.

November 18, 1980

TO: All Department Directors

FROM: House Counsel

RE: FEC Document Request

8304042003

The RNC has been ordered to produce all documents and materials described below. Production must be made as soon as possible. Production was originally requested prior to November 4, but was postponed as a result of our motion. An individual from each division in your department should be assigned responsibility for identification and segregation of any documents and materials falling within the categories set forth below. That individual should contact Carol or Catherine Gensior in my office immediately to coordinate a review of the materials and preparation for making the materials available for examination by FEC attorneys. Production must be completed not later than December 1.

The documents and materials requested are as follows:

Please produce in their entirety the following:

1. All documents and materials concerning meetings, discussions, correspondence, or other communications between the RNC and any of the following persons or organizations or their officials, employees, staff members, volunteers, organizers, or agents which relate in any way to the efforts of the RNC or the below listed organizations or individuals with respect to Ronald Reagan's

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Reagan-Bush Committee
Reagan for President Compliance Fund
Ruth Jones, Ltd.
Bailey, Deardourff & Associates, Inc.
Fund for a Conservative Majority
Citizens for Reagan in 1980
North Carolina Congressional Club
Americans for Reagan
National Conservative Political Action Committee
The Ronald Reagan Victory Fund
Americans for Change
Reagan for President in '80
Americans for an Effective Presidency
Anna Chennault
Stuart Spencer
Senator Jesse Helms
James Lake

2. All documents and materials relating to the contractual or professional relationship or any other association from January 1980 to present, between the RNC and the following entities, their agents, officers, or employees undertaken in connection with efforts on the part of the RNC which relate in any way to Ronald Reagan's general election campaign for President in 1980 or which would aid in the defeat of any other 1980 Presidential candidate.

'83 copys all invoices

Bailey, Deardourff and Associates, Inc.
Diversified Direct, Inc.
Wiland and Associates
Telepost
Arthur Finkelstein and Associates
Bedford Printing
Ruth Jones, Ltd.

3. All telephone bills and/or other records of telephone calls made or received by the RNC from May, 1980 to the present. — JCB — We will just open our phone co. files to them. at

If you have any questions, please call. Your full cooperation is needed and appreciated.

8304200935

Wiland & Associates, Inc.

219 EAST DAVIS STREET • CULPEPER, VIRGINIA 22701 • TELEPHONE AREA CODE (703) 825-5100

WORK ORDER NUMBER	ACCOUNT NO.	CUSTOMER P.O.	DATE	INVOICE NO.
24107	70	RNC-010062	January 23, 1980	25403

SOLD TO:	SHIPPED TO:
Republican National Committee c/o Stephen Winchell & Associates 1990 M Street, N.W., Suite 310 Washington, D. C. 20036 Attention: Sylvia Pearson	Communications Corp. of America One Direct Mail Plaza Boston, Virginia 22713 Attention: Liz Coates

INVOICE

FUNCTION PERFORMED - DESCRIPTION	QUANTITY	UNIT PRICE	EXTENSION	ACCT. CODE
Inter-Committee Merge/Purge #2 - RNC				
Process Mail File Input (including List Conversion and Duplicate Identification Processing)	888,029	$2.10/M	$1,864.86	
Tape deposits to be refunded when tapes are returned	3 tapes	20.00/tp.	60.00	
Virginia Sales Tax			74.59	

8304080

060930/50875

P14134
2-25-80

PER

THANK YOU

TERMS: NET 30 DAYS

TOTAL $1,999.45

IF YOUR CHECK WILL BE POSTMARKED ON/OR BEFORE _____

PAY THIS AMOUNT N/A

ORIGINAL INVOICE

Wiland & Associates, Inc.

219 EAST DAVIS STREET • CULPEPER, VIRGINIA 22701 • TELEPHONE AREA CODE (703) 825-5100

WORK ORDER NUMBER	ACCOUNT NO.	CUSTOMER P.O.	DATE	INVOICE NO.
25006	70	010518	February 8, 1980	25625

SOLD TO:	SHIPPED TO:
Republican National Committee c/o Stephen Winchell & Associates 1990 M Street, N.W., Suite 310 Washington, D. C. 20036 Attention: Clay Purty	Communications Corp. of America One Direct Mail Plaza Boston, Virginia 22713 Attention: Liz Coates

INVOICE

FUNCTION PERFORMED - DESCRIPTION	QUANTITY	UNIT PRICE	EXTENSION	ACCT. CODE
Copy NRCC Uniques for RNC				
Process input records	249,980	$ .25/M	$ 62.50	
Process output records	249,980	.25/M	62.50	
Produce the following:				
RCC Matches for RNC	235,260	4.50/M	1,058.67	
NRSC Matches for RNC	90,490	4.50/M	407.21	

8304042009

PAID
14350
2-29-80
PER
THANK YOU

2/12/80

060930/50875

RECEIVED
FEB 2 8 1980

TERMS: NET 30 DAYS

TOTAL $1,590.88

IF YOUR CHECK WILL BE POSTMARKED ON/OR BEFORE N/A

PAY THIS AMOUNT N/A

ORIGINAL INVOICE

Wiland & Associates, Inc.

219 EAST DAVIS STREET • CULPEPER, VIRGINIA 22701 • TELEPHONE AREA CODE (703) 825-5100

WORK ORDER NUMBER	ACCOUNT NO.	CUSTOMER P.O.	DATE	INVOICE NO.
26599-B	70	RNC-012858	June 25, 1980	27314

SOLD TO:	SHIPPED TO:
Republican National Committee c/o Stephen Winchell & Associates 1990 M Street, N.W., Suite 310 Washington, D. C. 20036 Attention: Clayton Purty	

INVOICE

FUNCTION PERFORMED - DESCRIPTION	QUANTITY	UNIT PRICE	EXTENSION	ACCT. CODE
Merge/Purge #3 - NRCC/RNC				
Process Mail File Input (Including List Conversion and Duplicate Identification Processing)	806,278	$2.10/M	$1,693.18	
Prepare Tape Copy of RCC Unique Records				
Process input records	305,144	.50/M	152.57	
Process output records	305,144	.50/M	152.57	
Shipping and Handling Charges to Return Magnetic Tapes	1 tape	2.50/tp.	2.50	
Tape deposit to be refunded when tapes are returned	2 tapes	20.00/tp.	40.00	

PAID
018715
7-24-80
MUL

RECEIVED
JUL 23 1980
ACCOUNTING

060930/R0876

OK to Pay

Pay this and → 2,000.00

TERMS NET 30 DAYS

TOTAL ⇨ ~~$2,040.82~~

IF YOUR CHECK WILL BE POSTMARKED ON/OR BEFORE _____

PAY THIS AMOUNT ⇨ N/A

ORIGINAL INVOICE

Wiland & Associates, Inc.

[illegible] INTERNATIONAL PARKWAY • P. O. BOX 5445 • FREDERICKSBURG, VA. 22401 • (703)

219 EAST D[illegible]

WORK ORDER NUMBER	ACCOUNT NO.	CUSTOMER P.O.	DATE	INVOICE NO.
28582	344	Mary Drape (Phone)	August 29, 1980	28063

SOLD TO:	SHIPPED TO:
The Baker Committee 25 K Street, N.E., 2nd Floor Washington, D. C. 20002 Attention: Mary Drape	The Baker Committee 25 K Street, N.E., 2nd Floor Washington, D. C. 20002

INVOICE

FUNCTION PERFORMED - DESCRIPTION	QUANTITY	UNIT PRICE	EXTENSION	ACCT. CODE
Select $250+ Donations from Baker for President Master File				
Process input records	52,818	$ .52/M	$27.47	
Process output records	5,046	.84/M	4.24	
Print 6-line Galley Listing to Baker $250+	5,046	min.chg.	50.00	

NOTE: This invoice is to be paid by
Republican National Committee
310 First Street, S. E.
Washington, D. C. 20003
ATTN: Mr. Charles Wick
Ms. Sarah Boyce

RECEIVED SEP 3 1980 ACCOUNTING

PAID 20490 9-8-80 PEP

TERMS: NET 30 DAYS

TOTAL ▶ THANK YOU $81.71

IF YOUR CHECK WILL BE POSTMARKED ON/OR BEFORE _____

PAY THIS AMOUNT ▶ N/A

ORIGINAL INVOICE

Wiland & Associates, Inc.

219 EAST DAVIS STREET • CULPEPER, VIRGINIA 22701 • TELEPHONE AREA CODE (703) 825-5100

WORK ORDER NUMBER	ACCOUNT NO.	CUSTOMER P.O.	DATE	INVOICE NO.
27569,71	70	13457	July 30, 1980	27642

SOLD TO:	SHIPPED TO:
Republican National Committee c/o Stephen Winchell & Associates 1990 M Street, N.W., Suite 310 Washington, D. C. 20036 Attention: Sherry Landrus	Sisk Mailing Service 9800 George Palmer Avenue Lanham, Maryland 20801

INVOICE

FUNCTION PERFORMED - DESCRIPTION	QUANTITY	UNIT PRICE	EXTENSION	ACCT. CODE
Continuing Programming				
Modify existing program to convert RNC Files				
Programming	16.50 hrs.	25.00/hr.	$412.50	
Computer Time for Assembly and Test	1.99 hrs.	120.00/hr.	238.80	
Convert and Sort CCA/RNC Files	162,947	2.28/M	371.52	
Convert and Sort CCA/RNC Key File	87,802	2.52/M	221.26	
Convert and Sort RNC BQ	18,467	5.28/M	97.51	
Convert and Sort RNC BB	12,659	5.28/M	66.84	
Convert and Sort RNC Key BS-CQ	420,283	1.38/M	579.99	
Split RNC Key BS-CQ into Subfiles				
Process input records	419,455	.18/M	75.50	
Process output records - Key CC	23,210	.48/M	11.14	
Process output records - R-7 B15	4,713	.48/M	2.27	
Process output records - R-7 A15 RAE	155,815	.48/M	74.79	
Process output records - R-7 A15/BRE	157,157	.48/M	75.44	
Process output records - R-7A BK/BRE	66,250	.48/M	31.80	
Process output records - R-7B 15/RAE	12,292	.48/M	5.90	
Prepare 5M Cross-section of RNC Key CC				
Process input records	23,210	1.08/M	25.07	
Process output records - R-7A BK/BRE	4,999	.90/M	4.50	
Process output records - R-7A 15/BRE	18,211	.90/M	16.39	

TERMS: NET 30 DAYS

TOTAL ▶

Cont. on Inv. #27643

IF YOUR CHECK WILL BE POSTMARKED ON/OR BEFORE _____

PAY THIS AMOUNT ▶

CUSTOMER'S COPY — PLEASE RETAIN FOR YOUR RECORDS

Wiland & Associates, Inc.

219 EAST DAVIS STREET • CULPEPER, VIRGINIA 22701 • TELEPHONE AREA CODE (703) 825-5100

WORK ORDER NUMBER	ACCOUNT NO.	CUSTOMER P.O.	DATE	INVOICE NO.
27569,71	70	13457	July 30, 1980	27643

SOLD TO:	SHIPPED TO:
Republican National Committee c/o Stephen Winchell & Associates 1990 M Street, N.W., Suite 310 Washington, D. C. 20036 Attention: Sherry Landrus	Sisk Mailing Service 9800 George Palmer Avenue Lanham, Maryland 20801

INVOICE

FUNCTION PERFORMED - DESCRIPTION	QUANTITY	UNIT PRICE	EXTENSION	ACCT. CODE
Plug RNC R7-A BK/BRE				
Process input records	4,999	stp.chg.	$ 17.50	
Process output records	4,999	stp.chg.	9.00	
Print RNC Full Text Laser Letters to:				
RNC BB M-5 ABK/BRE	12,652	32.00/M	404.86	
RNC BQ M-5 B15/RAE	18,433	32.00/M	589.86	
RNC R-7 B15/RAE 1	4,731	32.00/M	151.39	
RNC R-7 B15/RAE 2	12,292	32.00/M	393.34	
RNC R-7 A15/RAE	155,815	32.00/M	4,986.08	
RNC R-7 A15/BRE	157,157	32.00/M	5,029.02	
RNC R-7 ABK/BRE	66,250	32.00/M	2,120.00	
RNC R-7 A15/BRE	4,999	32.00/M	159.97	
Plugged RNC R-7A BK/BRE	18,211	32.00/M	582.75	

8304042001

RECEIVED SEP 10 1980 ACCOUNTING

charge $8,377.49 to 000910/50808
charge $8,377.50 to 000920/50884
16,754 99

PAID 20943 9-17-80 PER

THANK YOU

TERMS: NET 30 DAYS

TOTAL ▶ $16,754.99

IF YOUR CHECK WILL BE POSTMARKED ON/OR BEFORE _____ PAY THIS AMOUNT ▶ N/A

ORIGINAL INVOICE

Wiland & Associates, Inc.

219 EAST DAVIS STREET • CULPEPER, VIRGINIA 22701 • TELEPHONE AREA CODE (703) 825-5100

WORK ORDER NUMBER	ACCOUNT NO.	CUSTOMER P.O.	DATE	INVOICE NO.
28593	70	014158	September 30, 1980	28464

SOLD TO:	SHIPPED TO:
RNC/State Finance Project c/o Stephen Winchell & Associates 1990 M Street, N.W., Suite 310 Washington, D. C. 20036 Attention: Barbara Chase	Sisk Mailing Service 9800 George Palmer Avenue Lanham, Maryland 20801

INVOICE

FUNCTION PERFORMED - DESCRIPTION	QUANTITY	UNIT PRICE	EXTENSION	ACCT. CODE
Cross-check Illinois NRSC/Bush High Dollar File vs. Illinois State File				
Process input records	1,413	1.50/M	$ 2.12	
Process input records	21,668	1.50/M	32.50	
Process output records	1,214	stp.chg.	9.00	
Cross-check Illinois NRSC/Bush Low Dollar File vs. Illinois State File				
Process input records	9,808	1.04/M	10.20	
Process input records	21,668	1.04/M	22.53	
Process output records	8,324	1.06/M	8.82	
Cross-check New Jersey NRSC/Bush High Dollar File vs. New Jersey State File				
Process input records	660	.90/M	.59	
Process input records	42,378	.90/M	38.14	
Process output records	481	stp.chg.	4.80	
Cross-check New Jersey NRSC/Bush Low Dollar File vs. New Jersey State File				
Process input records	6,206	.90/M	5.59	
Process input records	42,378	.90/M	38.14	
Process output records	4,664	1.06/M	4.94	
Cross-check Pennsylvania NRSC/Bush High Dollar File vs. Pennsylvania State File				
Process input records	578	.90/M	.52	
Process input records	41,311	.90/M	37.18	
Process output records	554	stp.chg.	4.80	

TERMS: NET 30 DAYS

TOTAL ▶

Cont. on Inv. #28465

IF YOUR CHECK WILL BE POSTMARKED ON/OR BEFORE _____

PAY THIS AMOUNT ▶

ORIGINAL INVOICE

Wiland & Associates, Inc.

219 EAST DAVIS STREET • CULPEPER, VIRGINIA 22701 • TELEPHONE AREA CODE (703) 825-5100

WORK ORDER NUMBER	ACCOUNT NO.	CUSTOMER P.O.	DATE	INVOICE NO.
28593	70	014158	September 30, 1980	28465

SOLD TO:	SHIPPED TO:
RNC/State Finance Project c/o Stephen Winchell & Associates 1990 M Street, N.W., Suite 310 Washington, D. C. 20036 Attention: Barbara Chase	Sisk Mailing Service 9800 George Palmer Avenue Lanham, Maryland 20801

INVOICE

FUNCTION PERFORMED - DESCRIPTION	QUANTITY	UNIT PRICE	EXTENSION	ACCT. CODE
Cross-check Pennsylvania NRSC/Bush Low Dollar File vs. Pennsylvania State File				
Process input records	8,724	$ .90/M	$ 7.85	
Process input records	41,311	.90/M	37.18	
Process output records	8,662	1.06/M	9.18	
Print Laser Letters to the following Keys:				
AAA - CA NRSC High Dollar	980	32.40/M	31.75	
AAB - FL NRSC High Dollar	428	32.40/M	13.87	
AAD - LA NRSC High Dollar	109	32.40/M	3.53	
AAE - MI NRSC High Dollar	219	32.40/M	7.10	
AAG - NY NRSC High Dollar	458	32.40/M	14.84	
AAH - OH NRSC High Dollar	307	32.40/M	9.95	
AAJ - TN NRSC High Dollar	56	32.40/M	1.81	
AAK - WI NRSC, Party List, Bush High Dollar	1,397	32.40/M	45.26	
AAL - CA NRSC Low Dollar	32,899	32.40/M	1,065.93	
AAM - FL NRSC Low Dollar	13,077	32.40/M	423.69	
AAO - LA NRSC Low Dollar	2,070	32.40/M	67.07	
AAP - MI NRSC Low Dollar	6,185	32.40/M	200.39	
AAR - NY NRSC Low Dollar	10,880	32.40/M	352.51	
AAS - OH NRSC Low Dollar	8,658	32.40/M	280.52	
AAU - TN NRSC Low Dollar	888	32.40/M	28.77	
AAV - WI NRSC, Party List, Bush Low Dollar	32,855	32.40/M	1,064.50	
AAC - IL NRSC, Bush High Dollar	1,214	32.40/M	9.33	
AAN - IL NRSC, Bush Low Dollar	8,324	32.40/M	269.70	
AAF - NJ NRSC, Bush High Dollar	481	32.40/M	15.58	
AAQ - NU NRSC, Bush Low Dollar	4,664	32.40/M	151.11	

8304004 00

TERMS: NET 30 DAYS

TOTAL ➧

Cont. on Inv. #28466

IF YOUR CHECK WILL BE POSTMARKED ON/OR BEFORE _____

PAY THIS AMOUNT ➧

ORIGINAL INVOICE

Wiland & Associates, Inc.

219 EAST DAVIS STREET • CULPEPER, VIRGINIA 22701 • TELEPHONE AREA CODE (703) 825-5100

WORK ORDER NUMBER	ACCOUNT NO.	CUSTOMER P.O.	DATE	INVOICE NO.
28593	70	014158	September 30, 1980	28466

SOLD TO:	SHIPPED TO:
RNC/State Finance Project c/o Stephen Winchell & Associates 1990 M Street, N.W., Suite 310 Washington, D. C. 20036 Attention: Barbara Chase	Sisk Mailing Service 9800 George Palmer Avenue Lanham, Maryland 20801

INVOICE

8304042009 4

FUNCTION PERFORMED - DESCRIPTION	QUANTITY	UNIT PRICE	EXTENSION	ACCT. CODE
AAI - PA NRSC, Bush High Dollar	554	32.40/M	17.95	
AAT - PA NRSC, Bush Low Dollar	8,662	32.40/M	280.65	
Illinois Low Dollar - Party List	21,668	32.40/M	702.04	
New Jersey Low Dollar - Party List	42,378	32.40/M	1,373.05	
Pennsylvania Low Dollar - Party List	41,311	32.40/M	1,338.48	

RECEIVED
OCT 22 1980
ACCOUNTING

charge $374.08 to 080300/5275
charge $7,699.38 to 080300/5816

PAID
23491
10-22-80
PER

THANK YOU!

TERMS: NET 30 DAYS

TOTAL ▶ $8,073.46

IF YOUR CHECK WILL BE POSTMARKED ON/OR BEFORE _____

PAY THIS AMOUNT ▶ N/A

ORIGINAL INVOICE

Wiland & Associates, Inc.

219 EAST DAVIS STREET • CULPEPER, VIRGINIA 22701 • TELEPHONE AREA CODE (703) 825-5108

WORK ORDER NUMBER	ACCOUNT NO.	CUSTOMER P.O.	DATE	INVOICE NO.
28590	70	014158	September 30, 1980	28452

SOLD TO:	SHIPPED TO:
RNC/State Finance Project c/o Stephen Winchell & Associates 1990 M Street, N.W., Suite 310 Washington, D. C. 20036 Attention: Barbara Chase	Sisk Mailing Service 9800 George Palmer Avenue Lanham, Maryland 20801

INVOICE

FUNCTION PERFORMED - DESCRIPTION	QUANTITY	UNIT PRICE	EXTENSION	ACCT. CODE
Print RNC State Finance Laser Letters to the following Keys:				
A - CA RNC/NRCC/Reagan/Baker High Dollar	9,396	32.40/M	$ 304.43	
L - CA RNC/NRCC/Reagan/Baker Low Dollar	138,913	32.40/M	4,500.78	
B - FL RNC/NRCC/Reagan/Baker High Dollar	2,293	32.40/M	74.29	
M - FL RNC/NRCC/Reagan/Baker Low Dollar	47,147	32.40/M	1,527.63	
C - IL RNC/NRCC/Reagan/Baker High Dollar	1,886	32.40/M	61.11	
G - NY RNC/NRCC/Reagan/Baker High Dollar	2,448	32.40/M	79.32	
R - NY RNC/NRCC/Reagan/Baker Low Dollar	47,800	32.40/M	1,548.72	
O - LA RNC/NRCC/Reagan/Baker Low Dollar	9,097	32.40/M	294.74	
P - MI RNC/NRCC/Reagan/Baker Low Dollar	25,936	32.40/M	840.33	
S - OH RNC/NRCC/Reagan/Baker Low Dollar	34,224	32.40/M	1,108.86	
U - TN RNC/NRCC/Reagan/Baker Low Dollar	13,078	32.40/M	423.73	
V - WI RNC/NRCC/Reagan/Baker Low Dollar	12,186	32.40/M	394.83	
H - OH RNC/NRCC/Reagan/Baker High Dollar	1,341	32.40/M	43.45	
E - MI RNC/NRCC/Reagan/Baker High Dollar	1,314	32.40/M	43.45	

8304042009

TERMS: NET 30 DAYS

TOTAL ➧

Cont. on Inv. #28453

IF YOUR CHECK WILL BE POSTMARKED ON/OR BEFORE _____

PAY THIS AMOUNT ➧

ORIGINAL INVOICE

Wiland & Associates, Inc.

219 EAST DAVIS STREET • CULPEPER, VIRGINIA 22701 • TELEPHONE AREA CODE (703) 825-5100

WORK ORDER NUMBER	ACCOUNT NO.	CUSTOMER P.O.	DATE	INVOICE NO.
28590	70	014158	September 30, 1980	28453

SOLD TO:	SHIPPED TO:
RNC/State Finance Project c/o Stephen Winchell & Associates 1990 M Street, N.W., Suite 310 Washington, D. C. 20036 Attention: Barbara Chase	Sisk Mailing Service 9800 George Palmer Avenue Lanham, Maryland 20801

INVOICE

8304042009 6

FUNCTION PERFORMED - DESCRIPTION	QUANTITY	UNIT PRICE	EXTENSION	ACCT. CODE
K - WI RNC/NRCC/Reagan/Baker High Dollar	317	32.40/M	10.27	
J - TN RNC/NRCC/Reagan/Baker High Dollar	2,952	32.40/M	95.64	
D - LA RNC/NRCC/Reagan/Baker High Dollar	639	32.40/M	20.70	
F - NJ RNC/NRCC/Reagan/Baker High Dollar	842	32.40/M	27.28	
Q - NJ RNC/NRCC/Reagan/Baker Low Dollar	22,989	32.40/M	744.84	
N - IL RNC/NRCC/Reagan/Baker Low Dollar	37,399	32.40/M	1,211.73	
I - PA RNC/NRCC/Reagan/Baker High Dollar	947	32.40/M	30.68	
T - PA RNC/NRCC/Reagan/Baker Low Dollar	26,801	32.40/M	868.35	
AA - CA Bush High Dollar	1,253	32.40/M	40.60	
AC - LA Bush High Dollar	93	32.40/M	3.01	
AD - MI Bush High Dollar	491	32.40/M	15.91	
AE - NY Bush, Party List High Dollar	3,355	32.40/M	108.70	
AF - OH Bush, Party List High Dollar	6,345	32.40/M	205.58	
AG - TN Bush, Party List High Dollar	673	32.40/M	21.81	
AB - FL Bush, Party List High Dollar	2,316	32.40/M	75.04	
AI - FL Bush, Party List Low Dollar	24,285	32.40/M	786.83	
AH - CA Bush Low Dollar	1,132	32.40/M	36.68	
AJ - LA Bush, Party List Low Dollar	7,265	32.40/M	235.39	
AK - MI Bush, Party List Low Dollar	21,020	32.40/M	681.05	
AL - NY Bush, Party List Low Dollar	13,065	32.40/M	423.31	
AM - OH Bush, Party List Low Dollar	52,785	32.40/M	1,710.23	
AN - TN Bush, Party List Low Dollar	25,618	32.40/M	830.02	

C5C5CC/5C5/6

TERMS: NET 30 DAYS

TOTAL ▶ $19,429.32

IF YOUR CHECK WILL BE POSTMARKED ON/OR BEFORE _____

PAY THIS AMOUNT ▶ N/A

23491
10-22-80

ORIGINAL INVOICE

ADDRESS CHANGE

WILAND & ASSOCIATES
3101 International Pkwy.
P. O. Box 5445
FREDERICKSBURG, VA. 22401

Wiland & Associates, Inc.

CULPEPER, VIRGINIA 22701 • TELEPHONE AREA CODE (703) 825-5100

WORK ORDER NUMBER	ACCOUNT NO.	CUSTOMER P.O.	DATE	INVOICE NO.
28343,580,585,586, 28949,954,955	70	014021	September 26, 1980	28380

SOLD TO:	SHIPPED TO:
RNC/State Finance Project c/o Stephen Winchell & Associates 1990 M Street, N.W., Suite 310 Washington, D. C. 20036 Attention: Barbara Chase	Held in Library

INVOICE

FUNCTION PERFORMED - DESCRIPTION	QUANTITY	UNIT PRICE	EXTENSION	ACCT. CODE
Continuing Programming				
Modify existing program to convert New Jersey, Pennsylvania, Illinois and New York				
Programming	5.15 hrs.	25.00/hr.	$128.75	
Computer Time for Assembly and Test	1.05 hrs.	120.00/hr.	126.00	
Convert and Sort New Jersey State Records	42,637	3.96/M	168.84	
Cross-check Merge/Purge #1 Label Set 6 vs. Sorted New Jersey State				
Process input records	1,170	.90/M	1.05	
Process input records	41,807	.90/M	37.63	
Process output records - High Dollar	842	stp.chg.	9.00	
Cross-check Merge/Purge #1 Label Set 17 vs. Sorted New Jersey State				
Process input records	27,668	.71/M	19.64	
Process input records	41,828	.71/M	29.70	
Process output records - Low Dollar	22,989	.62/M	14.25	
Convert and Sort Pennsylvania File	41,359	3.96/M	163.78	
Cross-check Merge/Purge #1 Label Set 9 vs. Sorted Pennsylvania File				
Process input records	974	.90/M	.88	
Process input records	41,311	.90/M	37.18	
Process output records - High Dollar	947	stp.chg.	9.00	

TERMS NET 30 DAYS TOTAL ▶

Cont. on Inv. #28381

IF YOUR CHECK WILL BE POSTMARKED ON/OR BEFORE _____ PAY THIS AMOUNT ▶

ORIGINAL INVOICE

Wiland & Associates, Inc.

219 EAST DAVIS STREET • CULPEPER, VIRGINIA 22701 • TELEPHONE AREA CODE (703) 825-5100

WORK ORDER NUMBER	ACCOUNT NO.	CUSTOMER P.O.	DATE	INVOICE NO.
28343,580,585,586, ~~28949,954,955~~	70	014021	September 26, 1980	28381

SOLD TO:	SHIPPED TO:
RNC/State Finance Project c/o Stephen Winchell & Associates 1990 M Street, N.W., Suite 310 Washington, D. C. 20036 Attention: Barbara Chase	Held in Library

INVOICE

FUNCTION PERFORMED - DESCRIPTION	QUANTITY	UNIT PRICE	EXTENSION	ACCT. CODE
Cross-check Merge/Purge #1 Label Set 20 vs. Sorted Pennsylvania File				
Process input records	26,898	.71/M	19.10	
Process input records	41,311	.71/M	29.33	
Process output records - Low Dollar	26,801	.62/M	16.62	
Convert and Sort Illinois File	21,714	5.22/M	113.35	
Cross-check Merge/Purge #1 Label Set 3 vs. Sorted Illinois File				
Process input records	2,154	1.50/M	3.23	
Process input records	21,668	1.50/M	32.50	
Process output records - High Dollar	1,886	stp.chg.	9.00	
Cross-check Merge/Purge #1 Label Set 14 vs. Sorted Illinois File				
Process input records	40,163	.71/M	28.52	
Process input records	21,668	.71/M	15.38	
Process output records - Low Dollar	37,398	.54/M	20.19	
Select High and Low Dollar Files from Baker for President Master File				
Process input records	54,436	.66/M	35.93	
Process output records - High Dollar	9,150	.68/M	6.22	
Process output records - Low Dollar	45,286	.68/M	30.79	
Select by Dollar Amount and Year from Consolidated NRSC Master File				
Process input records	352,324	.40/M	140.93	
Process output records - Subfile 1	36,508	.44/M	16.06	
Process output records - Subfile 2	55,634	.44/M	24.48	
Process output records - Subfile 3	116,018	.44/M	51.05	

TERMS: NET 30 DAYS

TOTAL ➧

Cont. on Inv. #28382

IF YOUR CHECK WILL BE POSTMARKED ON/OR BEFORE _____

PAY THIS AMOUNT ➧

ORIGINAL INVOICE

Wiland & Associates, Inc.

219 EAST DAVIS STREET • CULPEPER, VIRGINIA 22701 • TELEPHONE AREA CODE (703) 825-5100

WORK ORDER NUMBER	ACCOUNT NO.	CUSTOMER P.O.	DATE	INVOICE NO.
28343,580,585,586, 28949,954,955	70	014021	September 26, 1980	28382

SOLD TO:	SHIPPED TO:
RNC/State Finance Project c/o Stephen Winchell & Associates 1990 M Street, N.W., Suite 310 Washington, D. C. 20036 Attention: Barbara Chase	Held in Library

INVOICE

FUNCTION PERFORMED - DESCRIPTION	QUANTITY	UNIT PRICE	EXTENSION	ACCT. CODE
erge NRSC Subfiles 1-3				
Process input records	36,508	.47/M	17.16	
Process input records	55,634	.47/M	26.15	
Process input records	116,018	.47/M	54.53	
Process output records	208,160	.38/M	79.10	
elect High and Low Dollar Files from erged NRSC Subfiles				
Process input records	208,160	.43/M	89.51	
Process output records - High Dollar	7,438	.44/M	3.27	
Process output records - Low Dollar	200,722	.44/M	88.32	
onvert and Sort New York Contributors	8,460	12.00/M	101.52	
elect High Dollar and Low Dollar Files rom Sorted New York Contributors				
Process input records	8,361	3.83/M	32.02	
Process output records - High Dollar	1,294	3.90/M	5.05	
Process output records - Low Dollar	7,067	3.90/M	27.56	
elect 1978 $500+ Donations from NRCC aster File				
Process input records	637,687	.34/M	216.81	
Process output records	226,997	.38/M	86.26	
erge RCC $500+ Donations and NRCC ctives 2				
Process input records	226,997	.47/M	106.69	
Process input records	26,835	.47/M	12.61	
Process output records	253,832	.38/M	96.46	

TERMS: NET 30 DAYS

TOTAL ⇨

Cont. on Inv. #28383

IF YOUR CHECK WILL BE POSTMARKED ON/OR BEFORE _____

PAY THIS AMOUNT ⇨

ORIGINAL INVOICE

Wiland & Associates, Inc.

219 EAST DAVIS STREET • CULPEPER, VIRGINIA 22701 • TELEPHONE AREA CODE (703) 825-5100

WORK ORDER NUMBER	ACCOUNT NO.	CUSTOMER P.O.	DATE	INVOICE NO.
28343,580,585,586, ~~28949,954,955~~	70	014021	September 26, 1980	28383

SOLD TO:	SHIPPED TO:
RNC/State Finance Project c/o Stephen Winchell & Associates 1990 M Street, N.W., Suite 310 Washington, D. C. 20036 Attention: Barbara Chase	Held in Library

INVOICE

FUNCTION PERFORMED - DESCRIPTION	QUANTITY	UNIT PRICE	EXTENSION	ACCT CODE
Select High and Low Dollar Files from Merged RCC Selects				
Process input records	253,832	.43/M	109.15	
Process output records - High Dollar	11,556	.44/M	5.08	
Process output records - Low Dollar	242,276	.44/M	106.60	
Merge/Purge #1 - RNC/State Finance Project				
Pre-Merge/Purge Processing Split Reagan, RNC, Ohio, Florida, Wisconsin, by Dollar Amount				
Process input records	671,806	.34/M	228.41	
Process output records - Reagan High	26,675	1.04/M	27.74	
Process output records - Reagan Low	123,779	1.04/M	128.73	
Process output records - RNC High	9,318	1.04/M	9.69	
Process output records - RNC Low	374,652	1.04/M	389.64	
Process output records - Ohio High	8,222	1.04/M	8.55	
Process output records - Ohio Low	66,902	1.04/M	69.58	
Process output records - Florida High	1,228	1.04/M	1.28	
Process output records - Florida Low	27,568	1.04/M	28.67	
Process output records - Wisconsin High	1,233	1.04/M	1.28	
Process output records - Wisconsin Low	32,280	1.04/M	33.57	
Process Mail File Input (Including List Conversion and Duplicate Identification Processing)	1,305,483	2.16/M	2,819.84	

TERMS NET 30 DAYS TOTAL ▶

Cont. on Inv. #28384

IF YOUR CHECK WILL BE POSTMARKED ON/OR BEFORE _____ PAY THIS AMOUNT ▶

ORIGINAL INVOICE

Wiland & Associates, Inc.

219 EAST DAVIS STREET • CULPEPER, VIRGINIA 22701 • TELEPHONE AREA CODE (703) 825-5100

WORK ORDER NUMBER	ACCOUNT NO.	CUSTOMER P.O.	DATE	INVOICE NO.
28343,580,585,586, ~~28949,954,955~~	70	014021	September 26, 1980	28384

SOLD TO:	SHIPPED TO:
RNC/State Finance Project c/o Stephen Winchell & Associates 1990 M Street, N.W., Suite 310 Washington, D. C. 20036 Attention: Barbara Chase	Held in Library

INVOICE

FUNCTION PERFORMED - DESCRIPTION	QUANTITY	UNIT PRICE	EXTENSION	ACCT. CODE
Process Suppression File Input (Including List Conversion and Duplicate Identification Processing)	68,215	min.chg.	150.00	
Produce State Counts by List Code Grouping				
Process input records	752,578	.34/M	255.88	
Print Reports	1 report	12.00/rpt.	12.00	
	5 reports	7.50/rpt.	37.50	
Process Mail File Output (Including Splits and Key Assignments)	752,606	.54/M	406.41	
Shipping and Handling Charges to Return Magnetic Tapes	25 tapes	2.50/tp.	62.50	

8302010

RECEIVED
OCT 23 1980
ACCOUNTING

PAID
23491
10-22-80

PER

THANK YOU

TERMS NET 30 DAYS

TOTAL ▶ $7,273.50

IF YOUR CHECK WILL BE POSTMARKED ON/OR BEFORE _____ PAY THIS AMOUNT ▶ N/A

ORIGINAL INVOICE

Stephen Winchell & Associates, Inc.
1990 M Street, N.W. • Suite 310 • Washington, D.C. 20036

March 21, 1979

Sara:

This invoice (Wiland 18478 and attached Statement of Account) shows the cost of creating test tapes from the NRCC owned lists: Non-Contributors, Inactives and President Ford Committee. Test tapes were ordered and mailed by the RNC.

Phil and I have seen this once or twice before and we both had thought that the $42.61 was for the application of the NRCC salt names to their files. Not true!!

The additional 14 salt names applied to these three tapes cost a total of $.01 -- (14 x $.84/M) The $42.61 is the correct cost of the creation of the test tapes.

Creating test tapes is always picked up by the Committee mailing the tests -- in this case, the RNC.

The $60.00 credit has been issued, leaving the $42.61 due Wiland from the RNC.

Honestly!!

Thanks. and Please give me a buzz if this long-winded explanation doesn't solve the problem.

Jean

Wiland & Associates Inc.

219 EAST DAVIS STREET • CULPEPER, VIRGINIA 22701 • TELEPHONE (703) 825-5100 • REMOTE COPIER (703) 825-6662

Republican National Committee
c/o Stephen Winchell & Associates
1990 M Street, N.W., Suite 310
Washington, D. C. 20037
Attention: Sylvia Pearson

w/ Eleanor

Statement of Account
As of January 31, 1979

Account #	Invoice #	Invoice Date	Amount
70	18478	9/13/78	$102.61
	18988	10/5/78	40.00 CR
	19438	11/7/78	20.00 CR
		Total	$ 42.61

Steve away invoice for

Paid 4/3/79

Aged Report by Invoice Date

Current	31-60	61-90	91-120	120+	Total
	.	(20.00)	(40.00)	102.61	$42.61

All checks received after January 31, 1979, will not be reflected on this statement.

of the Pkg who to conduct accounting

8304042010 3

PURCHASE ORDER

Republican National Committee.

310 First Street Southeast, Washington, D.C. 20003. (202) 484-6500

TO

Wiland and Associates
Mike Lawrence

SHIP TO

CCA

Attn: Liz Coates

DATE	DELIVERY DATE	REQUISITION	SHIP VIA	TERMS	PURCHASE ORDER NO.
5/7/79	By 5/16/79				007075

QUANTITY	DESCRIPTION	PRICE	AMOUNT
	From the Three Committee Merge/Purge please create the following:		
	Two nth name test cells (5,000 each) from the net file of RNC/NRCC duplicates.		
	Two nth name test cells (5,000 each) from the net file of the RNC/NRSC duplicates.		
	Identify records by the RNC keyline.		
	Tape will be passed against RNC masterfile to pick up all RNC donor history.		
	Please call with any questions		
		1105 $400/00	app.
	Thanks.		

8304201 0

FOR RESALE ☐ FOR RESALE TAX NUMBER

JB

PURCHASE ORDER

Republican National Committee.

310 First Street Southeast, Washington, D.C. 20003 (202) 484-6500

TO

Wiland & Associates
Culpeper, Virginia

SHIP TO

Sisk
9800 George Palmer Hwy.
Lanham, Maryland

DATE	DELIVERY DATE	SHIPPED VIA	F.O.B.	TERMS	PURCHASE ORDER NO.
11-08-79	ASAP	Wiland			009729

QUANTITY	DESCRIPTION	PRICE	AMOUNT
	COMPUTERIZATION OF RNC SPECIAL THANK YOU MAILING		
150M approx.	Computerize 2 up form delivered by Metro Printing on 11-12-79 AM.	10.00M	
	Fill in: Date: November 16, 1979 Name and address (spell out state) Salutation (Default: Friend) Name variable in letter: (Default: Truncate--delete comma and add period.)		
	Para 3 fill:		
	We are very grateful to you for your generosity for your loyalty and for your friendship, Mr. XXXXXXXXXXXX		
	Please telecopy computer fill for approval before beginning.		
	Thanks very much.		

Total $ 1,500.00

100410/50888

B30401201

☐ NOT FOR RESALE ☐ FOR RESALE TAX NUMBER

AUTHORIZED SIGNATURE

DUPLICATE

PURCHASE ORDER

Republican National Committee.

310 First Street Southeast, Washington, D.C. 20003. (202) 484-6500

TO

Wiland & Associates

Culpeper, VA

ATTN: Bob Perrott

SHIP TO

DATE	DELIVERY DATE	SHIP VIA	F.O.B.	TERMS	PURCHASE ORDER NO.
2/18/79	1/8/80				010062

QUANTITY	DESCRIPTION	PRICE	AMOUNT
825M approx.	Inter-Committee Merge/Purge See attached sheet for specifics	2.10/M	$2,000.00 approx.
	For dupedoodle tapes--NRCC/RNC and NRSC/RNC	4.50/M	
	Exact quantities to be confirmed		

830401 105

060930/50875

☐ NOT FOR RESALE ☐ FOR RESALE TAX NUMBER

Arlene Triplett

AUTHORIZED SIGNATURE

Form P.R.N.C. © The Dixon Board Inc., Box 515 Dallas, Texas

DUPLICATE

REPUBLICAN NATIONAL COMMITTEE
310 FIRST STREET SOUTHEAST • WASHINGTON, D.C. 20003
PHONE 202 484-6500

C81003

SHIP TO

land & Associates
lpeper, Virginia

CCA
Boscobn, Virginia

DELIVERY DATE	TERMS	SHIP VIA	F.O.B. POINT	PURCHASE ORDER NO.
ASAP				013117

QTY	DESCRIPTION	PRICE	AMOUNT
	Please create a tape of all NRCC unique names and delaver th CCA as soon as possible.		
	Included on tape should be contributors name, address and HPC,	.50M	$135.00
	NOTE: The RNC does not want a tape of RNC/NRCC duplicates from this merge/purge.		Approximate

060930/50876

8304012017

☐ NOT FOR RESALE ☐ FOR RESALE TAX NUMBER

AUTHORIZED SIGNATURE

DUPLICATE

OUR PURCHASE ORDER NUMBER MUST APPEAR ON ALL INVOICES, SHIPPING PAPERS AND PACKAGES

REPUBLICAN NATIONAL COMMITTEE
310 FIRST STREET SOUTHEAST • WASHINGTON, D.C. 20003
PHONE 202-484-6500

TO

Wiland & Associates

SHIP TO

041003

DATE	DELIVERY DATE	SHIP VIA	F.O.B.	TERMS	PURCHASE ORDER NO.
5-16-80					012858

QUANTITY	DESCRIPTION	PRICE	AMOUNT
	Inter-Committee Merge/Purge with the Nat'l Republican Congressional Committee.	2.10/M	$300.-
	See attached for further instructions.		
	060930/50876		

☐ NOT FOR RESALE ☐ FOR RESALE TAX NUMBER

Phillips & The Dunning Blank Inc., Box 505, Dallas, Texas

Katherine M. Aldous
AUTHORIZED SIGNATURE

DUPLICATE

OUR PURCHASE ORDER NUMBER MUST APPEAR ON ALL INVOICES, SHIPPING PAPERS, AND PACKAGES

8304042013E

REPUBLICAN NATIONAL COMMITTEE

310 FIRST STREET SOUTHEAST • WASHINGTON, D.C. 20003
PHONE 202-484-6500

C00144

TO	SHIP TO
Miland & Associates Culpeper, Virginia ATTN: Bob Perrot	CCA 1 Direct Marketing Plaza Boston, Virginia ATTN: Liz Coates

DATE	DELIVERY DATE	SHIP VIA	F.O.B.	TERMS	PURCHASE ORDER NO.
1-07-~~90~~	ASAP	Miland			010518

QUANTITY	DESCRIPTION	PRICE	AMOUNT
249,980	Please create a tape of all NRCC unique names and deliver to CCA as soon as possible.	.25M (records in)	$124.99 (total)
	Included on tape should be contributors name, address and HPC.	.25 (records out)	$124.99
	Also, please create the following tapes:		
235,260	1. A&l RNC/NRCC duplicates	4.50M*	$1,058.67
80,490	2. All RNC/NRSC duplicates		$407.21
	Please deliver these tapes to CCA as soon as possible.		$1,715.88
	*Based on input records. If NRCC and NRSC request duplicate tapes, the cost will be shardd.		
	Thanks.		

060930/50875

☐ NOT FOR RESALE ☐ FOR RESALE TAX NUMBER

Form P-8115 © The Drawing Board, Inc., Box 505, Orange, Texas

AUTHORIZED SIGNATURE

DUPLICATE

OUR PURCHASE ORDER NUMBER MUST APPEAR ON ALL INVOICES, SHIPPING PAPERS AND PACKAGES

REPUBLICAN NATIONAL COMMITTEE
310 FIRST STREET SOUTHEAST • WASHINGTON, D.C. 20003
PHONE 202-484-6500

A1000

TO
Wiland and Associates
ATTN: Denny Springman

SHIP TO
SISK

DATE	DELIVERY DATE			TERMS	PURCHASE ORDER NO.
6-2	ASAP	Wiland & Assoc. (Included)			013457

QUANTITY	DESCRIPTION	PRICE	AMOUNT
784,726	COMPUTERIZATION OF THE RNC H-5 AND R-7	32.00/M	
	See attached memo.		
	7TH RENEWAL VERSION A (SUSTAINING):		$25,111.23
156,085	15/RAE Codes: b3, b8, ca, cf, cj, ck, cm, and cn.		
175,642	15/BRE Codes: bx, b4, b9, cc, ce, ch, and cp		
71,465	BK/BRE Codes: bs, bt, bw, by, b2, b7, cb, and cf		
	7TH RENEWAL VERSION B (CAMPAIGNER):		
17,091	15/RAE Codes: bu, bz, b5, b6, cd, and cq		
	NOTE: IT IS VERY IMPORTANT THAT YOU TAKE A 5,000 CROSS SECTION FROM CODE cc AND ASSIGN CODE cb TO THE 5,000 TEST.		
	PROJECT NUMBER 5 VERSION A (SUSTAINING):		
162,947	15/RAE Codes: bc, be, bg, bk, bn, and bn.		
170,371	15/BRE Codes: ba, bd, bf, bh, and bp.		
12,659	BK/BRE Codes: bb.		
	PROJECT NUMBER 5 VERSION B (CAMPAIGNER):		
18,467	15/RAE Codes: bq.		
	change $11,662.21 to a60920/50885 change $13,449.06 to a60910/50808		
	PLEASE SEE ATTACHED MEMO FOR LASER INSTRUCTIONS		

☐ NOT FOR RESALE ☐ FOR RESALE TAX NUMBER

Debra Troyer Title
AUTHORIZED SIGNATURE

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DUPLICATE

OUR PURCHASE ORDER NUMBER MUST APPEAR ON ALL INVOICES, SHIPPING PAPERS AND PACKAGES

REPUBLICAN NATIONAL COMMITTEE
310 FIRST STREET SOUTHEAST • WASHINGTON, D.C. 20003
PHONE 202-484-6500

TO
Wiland & Associates

SHIP TO
Sisk Mailing Services

DATE	DELIVERY DATE				PURCHASE ORDER NO.
9-24-80	10-2-80				014167

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
	- STATE FINANCE PROJECT -		
			estimate
1	Perform a merge/purge with the following lists: Alabama State, Connecticut State, Mississippi State, RNC, Reagan and Baker. Split net files out by keys:		2,500.00

Label Set	Key	List
01	A	Conn. High $ (State/Reagan/Baker)
02	B	Conn. Low $ (State/RNC/Reagan/Baker)
03	C	Ala High $ (State/Reagan/Baker)
04	D	Ala Low $ (State/RNC/Reagan/Baker)
05	E	Miss High $ (State/Reagan/Baker)
06	F	Miss Low $ (RNC/Reagan/Baker)

Mississippi State Mills will all be supressed.

Modify letterwriters created on purchase order # 014158 to print the State Finance letter and contribution form on the Laser printer for the above mentioned lists.

Follow print instructions on purchase order #014158. estimates

approx. 50,000	The letter date is October 6, 1980 (to be confirmed).	32.40/M	1,620.00

charge $2,500 - to 0803CO/5015
charge $1,620 - to 0803CO/5016

$4,120.00

☐ NOT FOR RESALE ☐ FOR RESALE TAX NUMBER

AUTHORIZED SIGNATURE

DUPLICATE

OUR PURCHASE ORDER NUMBER MUST APPEAR ON ALL INVOICES, SHIPPING PAPERS AND PACKAGES

PURCHASE ORDER

REPUBLICAN NATIONAL COMMITTEE

310 FIRST STREET SOUTHEAST • WASHINGTON, D.C. 20003
PHONE 202-484-6500

PB1000

TO
Wiland & Associates

SHIP TO
Sisk Mailing Services

DATE	DELIVERY DATE	TERMS	PURCHASE ORDER NO.
9/3			014158

QUANTITY	DESCRIPTION	PRICE	AMOUNT
28,540	- STATE FINANCE PROJECT - Develop letterwriters to print the State Finance Project letter and contribution form on the Laser Printer for the following states: California, Florida, Illinois, Louisiana, Michigan, New Jersey, New York, Ohio, Pennsylvania, Tennessee and Wisconsin. Variables included as discussed over the phone: Page 1: State name (4 times) State Chairman - prefix/full name State Chairman - first name Page 2: Budget to raise - dollar amount State name - (1 time) Page 3: 2 versions: High & low dollar amounts High $: $100, $150, $250, $500, $1,000 $1000 $100 $150 Low $: $15, $25, $50, $100, $200 $200, $15, $25 State name - (2 times) Contribution form: State Chairman - first name/last name State Chairman Title Budget to raise - dollar amount To: State chairman - Prefix/full name State Party State Party address From: Contributor Contributor's address	Estimate 32.40/M (include letterwriter development) $874.80 080200/50816	

(con't on attached sheet)

☐ NOT FOR RESALE ☐ FOR RESALE TAX NUMBER

Form P-B115 © The Drawing Board, Inc., Box 909, Dallas, Texas

AUTHORIZED SIGNATURE

DUPLICATE

OUR PURCHASE ORDER NUMBER MUST APPEAR ON ALL INVOICES, SHIPPING PAPERS AND PACKAGES

8304042

REPUBLICAN NATIONAL COMMITTEE
310 FIRST STREET SOUTHEAST • WASHINGTON, D.C. 20003
PHONE 202-484-6500

C001A5

TO
Wiland & Associates

SHIP TO

Hold for printing at Wiland

- STATE FINANCE PROJECT -

DATE	DELIVERY DATE			TERMS	PURCHASE ORDER
8/25/80					014021

QUANTITY	DESCRIPTION	PRICE	AMOUNT
	Prepare a tape from the NRCC Masterfile for the State Finance Project Merge/Purge. Specifics to follow from David Himes.		estimate $400.00
	Perform a merge/purge, using the Match Master System with the following lists: RNC, NRCC, NRSC, Reagan, Baker, Bush, Florida, Louisiana, Michigan, New York, Ohio, Tennessee, Wisconsin and the Pennsylvania Suppression File.		estimate
	Process mail file input (including conversion and duplicate identification)	2.75/M	input
		.65/M	output
	NRSC, Illinois, New Jersey, Pennsylvania and Wisconsin names can not mail before September 23rd.		
	Suppress Pennsylvania names from the RNC, NRCC, NRSC, Reagan, Baker & Bush files.		
	When any duplicates appears between the NRSC file and any other file, retain the NRSC version (with the exception of Wisconsin). When duplicates appear between the Wisconsin file and the others, retain the Wisconsin version. 080200/60815	cross-dox	$2,000.
	Upon completion of the merge/purge, cross-checke the net file of RNC, NRCC, Reagan, Baker & Bush with the Illinois, New Jersey and Pennsylvania donor files, eliminating duplicates from the RNC, NRCC, Reagan, Baker & Bush file.		

8 30 04 20 11

☐ NOT FOR RESALE ☐ FOR RESALE TAX NUMBER

Form P-8115 © The Dreyfus Board, Inc., Box 505, Dallas, Texas

AUTHORIZED SIGNATURE

DUPLICATE

OUR PURCHASE ORDER NUMBER MUST APPEAR ON ALL INVOICES, SHIPPING PAPERS, AND PACKAGES

WILAND & ASSOCIATES INC 10/22/80 004508

28384	7273.50	.00	7273.50	COMPUTER SVS
28453	19429.32	.00	19429.32	COMPUTER SVS
28466	8073.46	.00	8073.46	COMPUTER SVS

1510

VLL

Republican National Committee

CHECK NO. 23491

68-408
560

310 First Street Southeast, Washington, D.C. 20003

BANK OF VIRGINIA - POTOMAC
1005 LEESBURG PIKE
FALLS CHURCH VA 22041

THIRTY FOUR THOUSAND SEVEN HUNDRED SEVENTY SIX *** DOLLARS 28 CENTS **********

CHECK DATE	CHECK NUMBER
10/22/80	004508

CHECK AMOUNT
$****34,776.28

PAY TO THE ORDER OF:

WILAND & ASSOCIATES INC
1101 INTERNATIONAL PKWY
PO BOX 5445
FREDERICKSBURG, VA 22401

NON-NEGOTIABLE

AUTHORIZED SIGNATURE

Pymt. Dat
80
AMT

1/-	-			$
1/-	-			$
1/-	-			$
1/-	-			$
1/-	-			$
1/-	-			$

INITIALS:	DATE:	TIME:	
MIN Dane	10-22		
ER DC			
ER Dane			

return check to:

REPUBLICAN NATIONAL COMMITTEE

VOUCHER MASTER
APC030

BATCH NO. 13111 VOUCHER NO. 101217 VNO VOUCHER DATE (Batch Date) 11/01/1215 VDT

VENDOR NO.	INVOICE NO.	INVOICE DATE	P.O. NUMBER
000786	12813814 I	101912161801	1011410121 I
	IVN	IVD	IVR

VENDOR NAME: Wilson & Associates

EXPLANATION: (24) Computer Svcs

Total Sale Amt.	Sales Tax
7,273.50	
TSA	TAX

MANUAL CHECK: Pay Code M | Bank Code 01 | Check No. | Check Date

COMPUTER CHECK: Pymt. Date 10-22-80

LN	FINANCIAL ORG. FOC	G/L ACCT GLA	CAMPAIGN ALLOC KEY CCM	DIST SALE AMT DSA
01	/1/-08-0200	50815		$
02	/1/- -			$
03	/1/- -			$
04	/1/- -			$
05	/1/- -			$
06	/1/- -			$
07	/1/- -			$
08	/1/- -			$
09	/1/- -			$
10	/1/- -			$

INITIALS:	DATE:	TIME:
ADMIN Done	10-22	
CLER PC		
OPER Done		

return check to:

Wiland & Associates, Inc.

219 EAST DAVIS STREET • CULPEPER, VIRGINIA 22701 • TELEPHONE AREA CODE (703) 825-5100

WORK ORDER NUMBER	ACCOUNT NO.	CUSTOMER P.O.	DATE	INVOICE NO.
28343,580,585,586, ~~28949,954,955~~	70	014021	September 26, 1980	28381

SOLD TO:	SHIPPED TO:
RNC/State Finance Project c/o Stephen Winchell & Associates 1990 M Street, N.W., Suite 310 Washington, D. C. 20036 Attention: Barbara Chase	Held in Library

INVOICE

FUNCTION PERFORMED - DESCRIPTION	QUANTITY	UNIT PRICE	EXTENSION	ACCT. CODE
Cross-check Merge/Purge #1 Label Set 20 vs. Sorted Pennsylvania File				
Process input records	26,898	.71/M	19.10	
Process input records	41,311	.71/M	29.33	
Process output records - Low Dollar	26,801	.62/M	16.62	
Convert and Sort Illinois File	21,714	5.22/M	113.35	
Cross-check Merge/Purge #1 Label Set 3 vs. Sorted Illinois File				
Process input records	2,154	1.50/M	3.23	
Process input records	21,668	1.50/M	32.50	
Process output records - High Dollar	1,886	stp.chg.	9.00	
Cross-check Merge/Purge #1 Label Set 14 vs. Sorted Illinois File				
Process input records	40,163	.71/M	28.52	
Process input records	21,668	.71/M	15.38	
Process output records - Low Dollar	37,398	.54/M	20.19	
Select High and Low Dollar Files from Baker for President Master File				
Process input records	54,436	.66/M	35.93	
Process output records - High Dollar	9,150	.68/M	6.22	
Process output records - Low Dollar	45,286	.68/M	30.79	
Select by Dollar Amount and Year from Consolidated NRSC Master File ,				
Process input records	352,324	.40/M	140.93	
Process output records - Subfile 1	36,508	.44/M	16.06	
Process output records - Subfile 2	55,634	.44/M	24.48	
Process output records - Subfile 3	116,018	.44/M	51.05	

TERMS: NET 30 DAYS

TOTAL ▶

Cont. on Inv. #28382

IF YOUR CHECK WILL BE POSTMARKED ON/OR BEFORE _____

PAY THIS AMOUNT ▶

ORIGINAL INVOICE

Wiland & Associates, Inc.

219 EAST DAVIS STREET • CULPEPER, VIRGINIA 22701 • TELEPHONE AREA CODE (703) 825-5100

WORK ORDER NUMBER	ACCOUNT NO.	CUSTOMER P.O.	DATE	INVOICE NO.
343,580,585,586, 28949,954,955	70	014021	September 26, 1980	28382

SOLD TO:	SHIPPED TO:
RNC/State Finance Project c/o Stephen Winchell & Associates 1990 M Street, N.W., Suite 310 Washington, D. C. 20036 Attention: Barbara Chase	Held in Library

INVOICE

FUNCTION PERFORMED - DESCRIPTION	QUANTITY	UNIT PRICE	EXTENSION	ACCT CODE
e NRSC Subfiles 1-3				
Process input records	36,508	.47/M	17.16	
Process input records	55,634	.47/M	26.15	
Process input records	116,018	.47/M	54.53	
Process output records	208,160	.38/M	79.10	
ct High and Low Dollar Files from ed NRSC Subfiles				
Process input records	208,160	.43/M	89.51	
Process output records - High Dollar	7,438	.44/M	3.27	
Process output records - Low Dollar	200,722	.44/M	88.32	
ert and Sort New York Contributors	8,460	12.00/M	101.52	
ct High Dollar and Low Dollar Files Sorted New York Contributors				
Process input records	8,361	3.83/M	32.02	
Process output records - High Dollar	1,294	3.90/M	5.05	
Process output records - Low Dollar	7,067	3.90/M	27.56	
ct 1978 $500+ Donations from NRCC r File				
Process input records	637,687	.34/M	216.81	
Process output records	226,997	.38/M	86.26	
RCC $500+ Donations and NRCC es 2				
Process input records	226,997	.47/M	106.69	
Process input records	26,835	.47/M	12.61	
Process output records	253,832	.38/M	96.46	

TERMS NET 30 DAYS TOTAL ▶

Cont. on Inv. #28383

IF YOUR CHECK WILL BE POSTMARKED ON/OR BEFORE _____ PAY THIS AMOUNT ▶

ORIGINAL INVOICE

Wiland & Associates, Inc.

219 EAST DAVIS STREET • CULPEPER, VIRGINIA 22701 • TELEPHONE AREA CODE (703) 825-5100

WORK ORDER NUMBER	ACCOUNT NO.	CUSTOMER P.O.	DATE	INVOICE NO.
28343,580,585,586, ~~28949,954,955~~	70	014021	September 26, 1980	28383

SOLD TO:	SHIPPED TO:
RNC/State Finance Project c/o Stephen Winchell & Associates 1990 M Street, N.W., Suite 310 Washington, D. C. 20036 Attention: Barbara Chase	Held in Library

INVOICE

FUNCTION PERFORMED - DESCRIPTION	QUANTITY	UNIT PRICE	EXTENSION	ACCT. CODE
elect High and Low Dollar Files from erged RCC Selects				
Process input records	253,832	.43/M	109.15	
Process output records - High Dollar	11,556	.44/M	5.08	
Process output records - Low Dollar	242,276	.44/M	106.60	
erge/Purge #1 - RNC/State Finance roject				
re-Merge/Purge Processing Split Reagan, RNC, Ohio, Florida, Wisconsin, by Dollar Amount				
Process input records	671,806	.34/M	228.41	
Process output records - Reagan High	26,675	1.04/M	27.74	
Process output records - Reagan Low	123,779	1.04/M	128.73	
Process output records - RNC High	9,318	1.04/M	9.69	
Process output records - RNC Low	374,652	1.04/M	389.64	
Process output records - Ohio High	8,222	1.04/M	8.55	
Process output records - Ohio Low	66,902	1.04/M	69.58	
Process output records - Florida High	1,228	1.04/M	1.28	
Process output records - Florida Low	27,568	1.04/M	28.67	
Process output records - Wisconsin High	1,233	1.04/M	1.28	
Process output records - Wisconsin Low	32,280	1.04/M	33.57	
rocess Mail File Input (Including List onversion and Duplicate Identification rocessing)	1,305,483	2.16/M	2,819.84	

TERMS: NET 30 DAYS

TOTAL ▶

Cont. on Inv. #28384

IF YOUR CHECK WILL BE POSTMARKED ON/OR BEFORE _____

PAY THIS AMOUNT ▶

ORIGINAL INVOICE

PURCHASE ORDER

REPUBLICAN NATIONAL COMMITTEE

310 FIRST STREET SOUTHEAST • WASHINGTON, D.C. 20003
PHONE 202-484-6500

SHIP TO

Wiland & Associates

Hold for printing at Wiland

- STATE FINANCE PROJECT -

DATE	DELIVERY DATE	SHIPPED VIA	F.O.B.	TERMS	PURCHASE ORDER NO.
8/25/80					014021

QUANTITY	DESCRIPTION	PRICE	AMOUNT
	Prepare a tape from the NRCC Masterfile for the State Finance Project Merge/Purge. Specifics to follow from David Himes.		estimate $400.00
	Perform a merge/purge, using the Match Master System with the following lists: RNC, NRCC, NRSC, Reagan, Baker, Bush, Florida, Louisiana, Michigan, New York, Ohio, Tennessee, Wisconsin and the Pennsylvania Suppression File. 947 32.40/M		estimates
	Process mail file input (including conversion and duplicate identification) 600786	2.75/M .05/M	input output
	NRSC, Illinois, New Jersey, Pennsylvania and Wisconsin names can not mail before September 23rd.		
	Suppress Pennsylvania names from the RNC, NRCC, NRSC, Reagan, Baker & Bush files.		
	When any duplicates appears between the NRSC file and any other file, retain the NRSC version (with the exception of Wisconsin). When duplicates appear between the Wisconsin file and the others, retain the Wisconsin version. 080500/50215		2,000
	Upon completion of the merge/purge, cross-checks the net file of RNC, NRCC, Reagan, Baker & Bush with the Illinois, New Jersey and Pennsylvania donor files, eliminating duplicates from the RNC, NRCC, Reagan, Baker & Bush file.		

8300422

NOT FOR RESALE ☐ FOR RESALE TAX NUMBER

AUTHORIZED SIGNATURE

PA115 © The Drawing Board, Inc., Box 505, Dallas, Texas

TRIPLICATE

OUR PURCHASE ORDER

Wiland & Associates, Inc.

219 EAST DAVIS STREET • CULPEPER, VIRGINIA 22701 • TELEPHONE AREA CODE (703) 825-5100

WORK ORDER NUMBER	ACCOUNT NO.	CUSTOMER P.O.	DATE	INVOICE NO.
28590	70	014158	September 30, 1980	28453

SOLD TO:	SHIPPED TO:
RNC/State Finance Project c/o Stephen Winchell & Associates 1990 M Street, N.W., Suite 310 Washington, D. C. 20036 Attention: Barbara Chase	Sisk Mailing Service 9800 George Palmer Avenue Lanham, Maryland 20801

INVOICE

FUNCTION PERFORMED - DESCRIPTION	QUANTITY	UNIT PRICE	EXTENSION	ACCT. CODE
K - WI RNC/NRCC/Reagan/Baker High Dollar	317	32.40/M	10.27	
J - TN RNC/NRCC/Reagan/Baker High Dollar	2,952	32.40/M	95.64	
D - LA RNC/NRCC/Reagan/Baker High Dollar	639	32.40/M	20.70	
F - NJ RNC/NRCC/Reagan/Baker High Dollar	842	32.40/M	27.28	
Q - NJ RNC/NRCC/Reagan/Baker Low Dollar	22,989	32.40/M	744.84	
N - IL RNC/NRCC/Reagan/Baker Low Dollar	37,399	32.40/M	1,211.73	
I - PA RNC/NRCC/Reagan/Baker High Dollar	947	32.40/M	30.68	
T - PA RNC/NRCC/Reagan/Baker Low Dollar	26,801	32.40/M	868.35	
AA - CA Bush High Dollar	1,253	32.40/M	40.60	
AC - LA Bush High Dollar	93	32.40/M	3.01	
AD - MI Bush High Dollar	491	32.40/M	15.91	
AE - NY Bush, Party List High Dollar	3,355	32.40/M	108.70	
AF - OH Bush, Party List High Dollar	6,345	32.40/M	205.58	
AG - TN Bush, Party List High Dollar	673	32.40/M	21.81	
AB - FL Bush, Party List High Dollar	2,316	32.40/M	75.04	
AI - FL Bush, Party List Low Dollar	24,285	32.40/M	786.83	
AH - CA Bush Low Dollar	1,132	32.40/M	36.68	
AJ - LA Bush, Party List Low Dollar	7,265	32.40/M	235.39	
AK - MI Bush, Party List Low Dollar	21,020	32.40/M	681.05	
AL - NY Bush, Party List Low Dollar	13,065	32.40/M	423.31	
AM - OH Bush, Party List Low Dollar	52,785	32.40/M	1,710.23	
AN - TN Bush, Party List Low Dollar	25,618	32.40/M	830.02	

C5530/5516

TERMS: NET 30 DAYS

TOTAL ▶ $19,429.32

IF YOUR CHECK WILL BE POSTMARKED ON/OR BEFORE _____ PAY THIS AMOUNT ▶ N/A

23491
10-22-80

ORIGINAL INVOICE

Wiland & Associates, Inc.

219 EAST DAVIS STREET • CULPEPER, VIRGINIA 22701 • TELEPHONE AREA CODE (703) 825-5100

WORK ORDER NUMBER	ACCOUNT NO.	CUSTOMER P.O.	DATE	INVOICE NO.
28590	70	014158	September 30, 1980	28452

SOLD TO:	SHIPPED TO:
RNC/State Finance Project c/o Stephen Winchell & Associates 1990 M Street, N.W., Suite 310 Washington, D. C. 20036 Attention: Barbara Chase	Sisk Mailing Service 9800 George Palmer Avenue Lanham, Maryland 20801

INVOICE

8304201 2

FUNCTION PERFORMED - DESCRIPTION	QUANTITY	UNIT PRICE	EXTENSION	ACCT. CODE
Print RNC State Finance Laser Letters to the following Keys:				
A - CA RNC/NRCC/Reagan/Baker High Dollar	9,396	32.40/M	$ 304.43	
L - CA RNC/NRCC/Reagan/Baker Low Dollar	138,913	32.40/M	4,500.78	
B - FL RNC/NRCC/Reagan/Baker High Dollar	2,293	32.40/M	74.29	
M - FL RNC/NRCC/Reagan/Baker Low Dollar	47,147	32.40/M	1,527.63	
C - IL RNC/NRCC/Reagan/Baker High Dollar	1,886	32.40/M	61.11	
G - NY RNC/NRCC/Reagan/Baker High Dollar	2,448	32.40/M	79.32	
R - NY RNC/NRCC/Reagan/Baker Low Dollar	47,800	32.40/M	1,548.72	
O - LA RNC/NRCC/Reagan/Baker Low Dollar	9,097	32.40/M	294.74	
P - MI RNC/NRCC/Reagan/Baker Low Dollar	25,936	32.40/M	840.33	
S - OH RNC/NRCC/Reagan/Baker Low Dollar	34,224	32.40/M	1,108.86	
U - TN RNC/NRCC/Reagan/Baker Low Dollar	13,078	32.40/M	423.73	
V - WI RNC/NRCC/Reagan/Baker Low Dollar	12,186	32.40/M	394.83	
H - OH RNC/NRCC/Reagan/Baker High Dollar	1,341	32.40/M	43.45	
E - MI RNC/NRCC/Reagan/Baker High Dollar	1,314	32.40/M	43.45	

TERMS: NET 30 DAYS

TOTAL ▷

Cont. on Inv. #28453

IF YOUR CHECK WILL BE POSTMARKED ON/OR BEFORE _____

PAY THIS AMOUNT ▷

ORIGINAL INVOICE

REPUBLICAN NATIONAL COMMITTEE

VOUCHER MASTER
APT030

CH NO. 3111 VOUCHER NO. 01211 (VNO) VOUCHER DATE (Batch Date) 11012121821 (VDT)

VENDOR NO.	INVOICE NO. (IVN)	INVOICE DATE (IVD)	P.O. NUMBER (IVR)
0000786	2814513	10191811801	0911411518

VENDOR NAME: Wilson & Associates

EXPLANATION: (24) Payroll Svcs

Total Sale Amt. (TSA)	Sales Tax (TAX)
19,429.32	

MANUAL CHECK: Pay Code M | Bank Code 01 | Check No. | Check Date | COMPUTER CHECK: Pymt. Date 10-22-80

LN	FINANCIAL ORG. FOC	G/L ACCT GLA	CAMPAIGN ALLOC KEY CCM	DIST SALE AMT DSA
01	1/-08-0200	50816		$
02	1/- -			$
03	1/- -			$
04	1/- -			$
05	1/- -			$
06	1/- -			$
07	1/- -			$
08	1/- -			$
09	1/- -			$
10	1/- -			$

INITIALS:	DATE:	TIME:
ADMIN Dane	10-22	
CLER		
OPER Dane		

return check to:

REPUBLICAN NATIONAL COMMITTEE

VOUCHER MASTER
APT030

BATCH NO. 31161 VOUCHER NO. 101212 (VNO) VOUCHER DATE (Batch Date) 11012218101 (VDT)

VENDOR NO.	INVOICE NO. (IVN)	INVOICE DATE (IVD)	P.O. NUMBER (IVR)
10007861	14814616 1	10191018101	10141151871

VENDOR NAME: Wilson & Associates

EXPLANATION: (24) Computer Svcs

Total Sale Amt. (TSA)	Sales Tax (TAX)
8,073.46	

ANUAL CHECK:	Pay Code	Bank Code	Check No.	Check Date	COMPUTER CHECK: Pymt. Date
N	M	01			10-22-80

FINANCIAL ORG. FOC	G/L ACCT GLA	CAMPAIGN ALLOC KEY CCM	DIST SALE AMT DSA
04-08-0200	50815		$ 274.08
04-08-0200	50816		$ 7,799.38
04-___-___			$
04-___-___			$
04-___-___			$
04-___-___			$
04-___-___			$
04-___-___			$
04-___-___			$
04-___-___			$

INITIALS:	DATE:	TIME:	
IN Done	10-30		
R LC			
Done			return check to:

Wiland & Associates, Inc.

219 EAST DAVIS STREET • CULPEPER, VIRGINIA 22701 • TELEPHONE AREA CODE (703) 825-5100

WORK ORDER NUMBER	ACCOUNT NO.	CUSTOMER P.O.	DATE	INVOICE NO.
28593	70	014158	September 30, 1980	28466

SOLD TO:	SHIPPED TO:
RNC/State Finance Project c/o Stephen Winchell & Associates 1990 M Street, N.W., Suite 310 Washington, D. C. 20036 Attention: Barbara Chase	Sisk Mailing Service 9800 George Palmer Avenue Lanham, Maryland 20801

INVOICE

FUNCTION PERFORMED - DESCRIPTION	QUANTITY	UNIT PRICE	EXTENSION	ACCT. CODE
AAI - PA NRSC, Bush High Dollar	554	32.40/M	17.95	
AAT - PA NRSC, Bush Low Dollar	8,662	32.40/M	280.65	
Illinois Low Dollar - Party List	21,668	32.40/M	702.04	
New Jersey Low Dollar - Party List	42,378	32.40/M	1,373.05	
Pennsylvania Low Dollar - Party List	41,311	32.40/M	1,338.48	

8304042014

RECEIVED
OCT 22 1980
ACCOUNTING

charge $374.08 to 080300/5815
charge $7,699.38 to 080300/5816

PAID
23491
10-22-80
PER

THANK YOU!

TERMS: NET 30 DAYS

TOTAL $8,073.46

IF YOUR CHECK WILL BE POSTMARKED ON/OR BEFORE _____ PAY THIS AMOUNT N/A

ORIGINAL INVOICE

Wiland & Associates, Inc.

219 EAST DAVIS STREET • CULPEPER, VIRGINIA 22701 • TELEPHONE AREA CODE (703) 825-5100

WORK ORDER NUMBER	ACCOUNT NO.	CUSTOMER P.O.	DATE	INVOICE NO.
28593	70	014158	September 30, 1980	28465

SOLD TO:	SHIPPED TO:
RNC/State Finance Project c/o Stephen Winchell & Associates 1990 M Street, N.W., Suite 310 Washington, D. C. 20036 Attention: Barbara Chase	Sisk Mailing Service 9800 George Palmer Avenue Lanham, Maryland 20801

INVOICE

FUNCTION PERFORMED - DESCRIPTION	QUANTITY	UNIT PRICE	EXTENSION	ACCT. CODE
Cross-check Pennsylvania NRSC/Bush Low Dollar File vs. Pennsylvania State File				
Process input records	8,724	$ .90/M	$ 7.85	
Process input records	41,311	.90/M	37.18	
Process output records	8,662	1.06/M	9.18	
Print Laser Letters to the following Keys:				
AAA - CA NRSC High Dollar	980	32.40/M	31.75	
AAB - FL NRSC High Dollar	428	32.40/M	13.87	
AAD - LA NRSC High Dollar	109	32.40/M	3.53	
AAE - MI NRSC High Dollar	219	32.40/M	7.10	
AAG - NY NRSC High Dollar	458	32.40/M	14.84	
AAH - OH NRSC High Dollar	307	32.40/M	9.95	
AAJ - TN NRSC High Dollar	56	32.40/M	1.81	
AAK - WI NRSC, Party List, Bush High Dollar	1,397	32.40/M	45.26	
AAL - CA NRSC Low Dollar	32,899	32.40/M	1,065.93	
AAM - FL NRSC Low Dollar	13,077	32.40/M	423.69	
AAO - LA NRSC Low Dollar	2,070	32.40/M	67.07	
AAP - MI NRSC Low Dollar	6,185	32.40/M	200.39	
AAR - NY NRSC Low Dollar	10,880	32.40/M	352.51	
AAS - OH NRSC Low Dollar	8,658	32.40/M	280.52	
AAU - TN NRSC Low Dollar	888	32.40/M	28.77	
AAV - WI NRSC, Party List, Bush Low Dollar	32,855	32.40/M	1,064.50	
AAC - IL NRSC, Bush High Dollar	1,214	32.40/M	9.33	
AAN - IL NRSC, Bush Low Dollar	8,324	32.40/M	269.70	
AAF - NJ NRSC, Bush High Dollar	481	32.40/M	15.58	
AAQ - NU NRSC, Bush Low Dollar	4,664	32.40/M	151.11	

TERMS: NET 30 DAYS

TOTAL ▶

Cont. on Inv. #28466

IF YOUR CHECK WILL BE POSTMARKED ON/OR BEFORE _____

PAY THIS AMOUNT ▶

ORIGINAL INVOICE

Wiland & Associates, Inc.

219 EAST DAVIS STREET • CULPEPER, VIRGINIA 22701 • TELEPHONE AREA CODE (703) 825-5100

WORK ORDER NUMBER	ACCOUNT NO.	CUSTOMER P.O.	DATE	INVOICE NO.
28593	70	014158	September 30, 1980	28464

SOLD TO:	SHIPPED TO:
RNC/State Finance Project c/o Stephen Winchell & Associates 1990 M Street, N.W., Suite 310 Washington, D. C. 20036 Attention: Barbara Chase	Sisk Mailing Service 9800 George Palmer Avenue Lanham, Maryland 20801

INVOICE

FUNCTION PERFORMED - DESCRIPTION	QUANTITY	UNIT PRICE	EXTENSION	ACCT. CODE
Cross-check Illinois NRSC/Bush High Dollar File vs. Illinois State File				
Process input records	1,413	1.50/M	$ 2.12	
Process input records	21,668	1.50/M	32.50	
Process output records	1,214	stp.chg.	9.00	
Cross-check Illinois NRSC/Bush Low Dollar File vs. Illinois State File				
Process input records	9,808	1.04/M	10.20	
Process input records	21,668	1.04/M	22.53	
Process output records	8,324	1.06/M	8.82	
Cross-check New Jersey NRSC/Bush High Dollar File vs. New Jersey State File				
Process input records	660	.90/M	.59	
Process input records	42,378	.90/M	38.14	
Process output records	481	stp.chg.	4.80	
Cross-check New Jersey NRSC/Bush Low Dollar File vs. New Jersey State File				
Process input records	6,206	.90/M	5.59	
Process input records	42,378	.90/M	38.14	
Process output records	4,664	1.06/M	4.94	
Cross-check Pennsylvania NRSC/Bush High Dollar File vs. Pennsylvania State File				
Process input records	578	.90/M	.52	
Process input records	41,311	.90/M	37.18	
Process output records	554	stp.chg.	4.80	

TERMS: NET 30 DAYS

TOTAL ▶

Cont. on Inv. #28465

IF YOUR CHECK WILL BE POSTMARKED ON/OR BEFORE _____

PAY THIS AMOUNT ▶

ORIGINAL INVOICE

PURCHASE ORDER

REPUBLICAN NATIONAL COMMITTEE
310 FIRST STREET SOUTHEAST • WASHINGTON, D.C. 20003
PHONE 202-484-6500

SHIP TO

Wiland & Associates

Sisk Mailing Services

DELIVERY DATE				PURCHASE ORDER NO.
				014158

DESCRIPTION	PRICE	AMOUNT
- STATE FINANCE PROJECT -		
Develop letterwriters to print the State Finance Project letter and contribution form on the Laser Printer for the following states: California, Florida, Illinois, Louisiana, Michigan, New Jersey, New York, Ohio, Pennsylvania, Tennessee and Wisconsin.		
Variables included as discussed over the phone:	Estimate	
Page 1: State name (4 times) State Chairman - prefix/full name State Chairman - first name	32.40/M (includes letterwriter development)	
Page 2: Budget to raise - dollar amount State name - (1 time)		
Page 3: 2 versions: High & low dollar amounts High $: $100, $150, $250, $500, $1,000 $1000 $100 $150		$81.80
Low $: $15, $25, $50, $100, $200 $200, $15, $25		
State name - (2 times)		
Contribution form: 000786 080200 / 50816		
State Chairman - first name/last name State Chairman Title		
Budget to raise - dollar amount To: State chairman - Prefix/full name State Party State Party address		
From: Contributor Contributor's address (con't on attached sheet)		

E ☐ FOR RESALE TAX NUMBER

Barbara Cl

AUTHO

WILAND & ASSOCIATES INC 09/17/80 002747

7843 16754.99 .00 16754.99 PRINTING SVS

78101

771

Republican National Committee

310 First Street Southeast, Washington, D.C. 20003

CHECK NO 20943

BP 408
560

Pymt. Dat

80

BANK OF VIRGINIA - POTOMAC
7205 LEESBURG PIKE
FALLS CHURCH, VA. 22041

SIXTEEN THOUSAND SEVEN HUNDRED FIFTY FOUR DOLLARS
99 CENTS **********

DATE	CHECK NUMBER
09/17/80	002747

E AMT

PAY TO THE ORDER OF:
WILAND & ASSOCIATES INC
BOX 899
CULPEPER, VA 22701

$****16,754.99

77.49

77.50

NON-NEGOTIABLE

AUTHORIZED SIGNATURE

0 4 0 3

05 /1/- - $

06 /1/- - $

07 /1/- - $

08 /1/- - $

09 /1/- - $

10 /1/- - $

INITIALS:		DATE:	TIME:	
ADMIN	Dana	9-17		
LER	[illegible]	9-17		
OPER	Dana	9-17		

return check to:

REPUBLICAN NATIONAL COMMITTEE

VOUCHER MASTER
APT030

H NO. 13101 VOUCHER NO. 101715 (VNO) VOUCHER DATE (Batch Date) 101911781 01 (VDT)

NDOR NO. 0100178161 INVOICE NO. 1771614131 (IVN) INVOICE DATE 101731018101 (IVD) P.O. NUMBER 101131415171 (IVR)

NDOR NAME: W. Lord & Associates Inc

PLANATION: Printing Svcs
(24)

Total Sale Amt. 16,754.99 (TSA) Sales Tax (TAX)

NUAL CHECK: Pay Code M Bank Code 01 Check No. Check Date COMPUTER CHECK: Pymt. Date 09-17-80

FINANCIAL ORG. FOC	G/L ACCT GLA	CAMPAIGN ALLOC KEY CCM	DIST SALE AMT DSA
V-06-0910	50808		$ 8,377.49
V-06-0920	50885		$ 8,377.50
V-___-___			$
V-___-___			$
V-___-___			$
V-___-___			$
V-___-___			$
V-___-___			$
V-___-___			$
V-___-___			$

TIALS: DATE: TIME:

IN Done 9-17

ER [illegible] 9-17

ER Done 9-17

return check to:

Wiland & Associates, Inc.

219 EAST DAVIS STREET • CULPEPER, VIRGINIA 22701 • TELEPHONE AREA CODE (703) 825-5100

WORK ORDER NUMBER	ACCOUNT NO.	CUSTOMER P.O.	DATE	INVOICE NO.
27569,71	70	13457	July 30, 1980	27643

SOLD TO:	SHIPPED TO:
Republican National Committee c/o Stephen Winchell & Associates 1990 M Street, N.W., Suite 310 Washington, D. C. 20036 Attention: Sherry Landrus	Sisk Mailing Service 9800 George Palmer Avenue Lanham, Maryland 20801

INVOICE

FUNCTION PERFORMED - DESCRIPTION	QUANTITY	UNIT PRICE	EXTENSION	ACCT. CODE
ug RNC R7-A BK/BRE				
Process input records	4,999	stp.chg.	$ 17.50	
Process output records	4,999	stp.chg.	9.00	
int RNC Full Text Laser Letters to:				
RNC BB M-5 ABK/BRE	12,652	32.00/M	404.86	
RNC BQ M-5 B15/RAE	18,433	32.00/M	589.86	
RNC R-7 B15/RAE 1	4,731	32.00/M	151.39	
RNC R-7 B15/RAE 2	12,292	32.00/M	393.34	
RNC R-7 A15/RAE	155,815	32.00/M	4,986.08	
RNC R-7 A15/BRE	157,157	32.00/M	5,029.02	
RNC R-7 ABK/BRE	66,250	32.00/M	2,120.00	
RNC R-7 A15/BRE	4,999	32.00/M	159.97	
Plugged RNC R-7A BK/BRE	18,211	32.00/M	582.75	

8304 20 3

RECEIVED SEP 10 1980 ACCOUNTING

charge $8,377.49 to 060916/50808
charge $8,377.50 to 060920/50880
16,754 99

PAID 20943 9-17-80 FMB

PER

THANK YOU

TERMS NET 30 DAYS

TOTAL ▷ $16,754.99

IF YOUR CHECK WILL BE POSTMARKED ON/OR BEFORE _____ PAY THIS AMOUNT ▷ N/A

ORIGINAL INVOICE

Wiland & Associates, Inc.

219 EAST DAVIS STREET • CULPEPER, VIRGINIA 22701 • TELEPHONE AREA CODE (703) 825-5100

WORK ORDER NUMBER	ACCOUNT NO.	CUSTOMER P.O.	DATE	INVOICE NO.
27569,71	70	13457	July 30, 1980	27642

SOLD TO:	SHIPPED TO:
Republican National Committee c/o Stephen Winchell & Associates 1990 M Street, N.W., Suite 310 Washington, D. C. 20036 Attention: Sherry Landrus	Sisk Mailing Service 9800 George Palmer Avenue Lanham, Maryland 20801

INVOICE

FUNCTION PERFORMED - DESCRIPTION	QUANTITY	UNIT PRICE	EXTENSION	ACCT. CODE
Continuing Programming				
Modify existing program to convert RNC Files				
Programming	16.50 hrs.	25.00/hr.	$412.50	
Computer Time for Assembly and Test	1.99 hrs.	120.00/hr.	238.80	
Convert and Sort CCA/RNC Files	162,947	2.28/M	371.52	
Convert and Sort CCA/RNC Key File	87,802	2.52/M	221.26	
Convert and Sort RNC BQ	18,467	5.28/M	97.51	
Convert and Sort RNC BB	12,659	5.28/M	66.84	
Convert and Sort RNC Key BS-CQ	420,283	1.38/M	579.99	
Split RNC Key BS-CQ into Subfiles				
Process input records	419,455	.18/M	75.50	
Process output records - Key CC	23,210	.48/M	11.14	
Process output records - R-7 B15	4,713	.48/M	2.27	
Process output records - R-7 A15 RAE	155,815	.48/M	74.79	
Process output records - R-7 A15/BRE	157,157	.48/M	75.44	
Process output records - R-7A BE/BRE	66,250	.48/M	31.80	
Process output records - R-7B 15/RAE	12,292	.48/M	5.90	
Prepare 5% Cross-section of RNC Key CC				
Process input records	23,210	1.08/M	25.07	
Process output records - R-7A BE/BRE	4,999	.90/M	4.50	
Process output records - R-7A 15/BRE	18,211	.90/M	16.39	

TERMS NET 30 DAYS

TOTAL ▷

Cont. on Inv. #27643

IF YOUR CHECK WILL BE POSTMARKED ON/OR BEFORE _____

PAY THIS AMOUNT ▷

CUSTOMER'S COPY — PLEASE RETAIN FOR YOUR RECORDS

PURCHASE ORDER

REPUBLICAN NATIONAL COMMITTEE

310 FIRST STREET SOUTHEAST • WASHINGTON, D.C. 20003
PHONE 202-484-6500

TO
Wiland and Associates
ATTN: Denny Springman

SHIP TO
SISK

DATE	DELIVERY DATE	REQUISITIONER	SHIP VIA	TERMS	PURCHASE ORDER NO.
6-2	ASAP	Wiland & Assoc. (Included)			013457

QUANTITY	DESCRIPTION	PRICE	AMOUNT
784,726	COMPUTERIZATION OF THE RNC M-5 AND R-7	32.00/M	
	See attached memo.		
	7TH RENEWAL VERSION A (SUSTAINING):		$25,111.23
156,085	15/RAE Codes: b3, b8, ca, cf, ci, ck, cm, and cn.		
175,642	15/BRE Codes: bx, b4, b9, cc, ce, ch, and cp		
71,465	BK/BRE Codes: bs, bt, bw, by, b2, b7, cb, and cf		
	7TH RENEWAL VERSION B (CAMPAIGNERS):		
17,091	15/RAE Codes: bd, bz, b5, b6, cd, and cq		
	NOTE: IT IS VERY IMPORTANT THAT YOU TAKE A 5,000 CROSS SECTION FROM CODE cc AND ASSIGN CODE cb TO THE 5,000 TEST.		
	PROJECT NUMBER 5 VERSION A (SUSTAINING):		
162,947	15/RAE Codes: bc, be, bg, bk, bm, and bn.		
170,371	15/BRE Codes: ba, bd, bf, bh, and bp.		
12,659	BK/BRE Codes: bb.		
	PROJECT NUMBER 5 VERSION B (CAMPAIGNER):		
18,467	15/RAE Codes: bq.		
	change $11,662.21 to a00920/50885		
	change $13,449.01 to a00910/50808		
	PLEASE SEE ATTACHED MEMO FOR LASER INSTRUCTIONS		
	000786		

☐ NOT FOR RESALE ☐ FOR RESALE TAX NUMBER

AUTHORIZED SIGNATURE

Form P-R115 © The Dennis Rivard, Inc., Box 505, Dallas, Texas

000786 WILAND & ASSOCIATES INC 09/09/80 020490

3003 81.71 81.71 PRINTING SVS

918101

Republican National Committee

310 First Street Southeast, Washington, D.C. 20003

CHECK NO. 20490

49-408/560

BANK OF VIRGINIA - POTOMAC
[illegible] LEESBURG PIKE
[illegible] CHURCH, VA 22041

PAY EXACTLY 81 DOLLARS AND 71 CENTS

DATE	CHECK NUMBER
09/09/80	020490

AMOUNT
$********81.71

PAY TO THE ORDER OF
WILAND & ASSOCIATES INC
BOX 899
CULPEPER, VA 22701

NON-NEGOTIABLE

AUTHORIZED SIGNATURE

Pymt. Date
9/8

AMT

5	1/-				$
6	1/-				$
7	1/-				$
8	1/-				$
9	1/-				$
10	1/-				$

INITIALS:	DATE:	TIME:	
MIN Dave	9-9		
ER			
ER WS	9-9		

Robin
return check to:

REPUBLICAN NATIONAL COMMITTEE
VOUCHER MASTER
APT030

VOUCHER NO. 101131 (VNO) VOUCHER DATE (Batch Date) 10191019810 (VDT)

VENDOR NO. 10001781G1

INVOICE NO. 12810131 (IVN) INVOICE DATE 10181219810 (IVD) P.O. NUMBER (IVR)

VENDOR NAME: W Lord & Associates Inc

EXPLANATION: (24) Printing Svs

Total Sale Amt. (TSA): 81.71 Sales Tax (TAX):

MANUAL CHECK: Pay Code M Bank Code 01 Check No. Check Date COMPUTER CHECK: Pymt. Date 09-09-80

LN	FINANCIAL ORG. FOC	G/L ACCT GLA	CAMPAIGN ALLOC KEY CCM	DIST SALE AMT DSA
01	/1/-06 - 2200	51311		$
02	/1/- -			$
03	/1/- -			$
04	/1/- -			$
05	/1/- -			$
06	/1/- -			$
07	/1/- -			$
08	/1/- -			$
09	/1/- -			$
10	/1/- -			$

INITIALS:	DATE:	TIME:
ADMIN Done	9-9	
CLER LS.		
OPER LD	9-9	

Robin
return check to:

Wiland & Associates, Inc.

[illegible] NATIONAL PARKWAY • P. O. BOX 5445 • FREDERICKSBURG, VA 22401 • (703) 7[illegible]

219 EAST DAY[illegible]

WORK ORDER NUMBER	ACCOUNT NO.	CUSTOMER P.O.	DATE	INVOICE NO.
28582	344	Mary Drape(Phone)	August 29, 1980	28063

SOLD TO:	SHIPPED TO:
The Baker Committee 25 K Street, N.E., 2nd Floor Washington, D. C. 20002 Attention: Mary Drape	The Baker Committee 25 K Street, N.E., 2nd Floor Washington, D. C. 20002

INVOICE

FUNCTION PERFORMED - DESCRIPTION	QUANTITY	UNIT PRICE	EXTENSION	ACCT. CODE
Select $250+ Donations from Baker for President Master File				
Process input records	52,818	$ .52/M	$27.47	
Process output records	5,046	.84/M	4.24	
Print 6-line Galley Listing to Baker $250+	5,046	min.chg.	50.00	

8304040 01

NOTE: This invoice is to be paid by
Republican National Committee
310 First Street, S. E.
Washington, D. C. 20003
ATTN: Mr. Charles Wick
Ms. Sarah Boyce

RECEIVED SEP 3 1980 ACCOUNTING

PAID 20490 9-8-80 PER

TERMS: NET 30 DAYS

TOTAL ▷ THANK YOU $81.71

IF YOUR CHECK WILL BE POSTMARKED ON/OR BEFORE _____ PAY THIS AMOUNT ▷ N/A

ORIGINAL INVOICE

Wiland & Associates, Inc.

WORK ORDER NUMBER	ACCOUNT NO.	CUSTOMER P.O.	DATE	INVOICE NO.
28582	344	Mary Drape (Phone)	August 29, [illegible]	[illegible]3

SOLD TO:	SHIPPED TO:
The Baker Committee 25 K Street, N.E., 2nd Floor Washington, D. C. 20002 Attention: Mary Drape	The Baker Committee 25 K Street, N.E., [illegible] Washington, D. C. [illegible]

INVOICE

FUNCTION PERFORMED - DESCRIPTION	QUANTITY	UNIT PRICE	ACCT. CODE
830402036			
Select $250+ Donations from Baker for President Master File			
Process input records	52,918	$ .52/M	[illegible]
Process output records	5,046	.84/M	[illegible]
Print 6-line Galley Listing to Baker $250+	5,046	min. ch.	[illegible]

NOTE: This invoice is to be paid by
Republican National Committee
310 First Street, S. E.
Washington, D. C. 20003
ATTN: Mr. Charles Wick
Ms. Sarah Boyce

RECEIVED
SEP 3 1980
ACCOUNTING

PAID
20[illegible]
9-5-80

PER

TERMS NET 30 DAYS

TOTAL $ [illegible]

IF YOUR CHECK WILL BE POSTMARKED ON/OR BEFORE _____ PAY THIS AMOUNT $ [illegible]

ORIGINAL INVOICE

REQUEST FOR PURCHASE ORDER

Republican National Committee.
310 First Street Southeast, Washington, D.C. 20003 (202) 484-6500

VENDOR

Wiland & Associates, Inc.
International Parkway
P. O. Box 5545
Fredericksburg, VA 22401

DEPT.

Prelude to Victory

THIS IS A REQUEST-
NOT AN APPROVED PURCHASE ORDER.

MARK PACKAGES:

F.O.B.	Routing	Date Required	Terms	Date Prepared	Quotation Prices
		9/9/80		9/5/80	

Summary of Quotations Obtained:	Vendors		

Quantity	Description	List Price	Discount%	Net Unit Price	Extended Price
1	print out of Baker Committee list				81
2					
3					
4					
5					
6					
7					
8					

Remarks/Special Instructions:

Please return check to Kalin Butirich

SUBTOTAL		
TAX, IF APPLICABLE		
NET TOTAL	81	71

Account Number	Requested By	Approved By	Financial Approval
0522051311	Kalin Butirich		

DUPLICATE

WILAND & ASSOCIATES INC 7/24/80 018715

27319 2,000.82 2,000.82 MERGE PURGE SVS

Republican National Committee.

310 First Street Southeast, Washington, D.C. 20003

CHECK NO 18715

68-408
550

BANK OF VIRGINIA - POTOMAC
6299 LEESBURG PIKE
FALLS CHURCH, VA. 22041

DATE	CHECK NUMBER
07/24/80	018715

PAY EXACTLY 2,000 DOLLARS AND 82 CENTS

AMOUNT
$******2,000.82

PAY TO THE ORDER OF:
WILAND & ASSOCIATES INC
BOX 899
CULPEPER, VA 22701

NON-NEGOTIABLE

AUTHORIZED SIGNATURE

⑈018715⑈ ⑆054002⑆ 88

06/1/-/ /-/ / / /

REPUBLICAN NATIONAL COMMITTEE
VOUCHER MASTER
APT030

BATCH NO. 31111 VOUCHER NO. 10 1 1181 (VNO) VOUCHER DATE (Batch date) 10 07 12-13 81 G (VDT)

VENDOR NO. (VND)	INVOICE NO. (IVN)	INVOICE DATE (IVD)	P.O. NUMBER (IVR)
10 10 10 7 18 16	12 7 13 1 14 1	10 16 12 15 78 10 1	10 1 1 2 4 8 15 5 8 1

Vendor Name: Wilson and Associates

Explanation: MEIRIGIEI-IPIUIRIGIEI ISIVIS (24)

Total Sale Amt. (TSA)	Sales Tax (TAX)
2,000.82	

MANUAL CHECK: Pay Code M | Bank Code 01 | Check No. | Check Date | COMPUTER CHECK: Pymt Date 07-23-80

LN	FINANCIAL ORG. FOC	G/L ACCT GLA	CAMPAIGN ALLOC KEY CCM	DIST SALE AMT DSA
01	1-1614-1619136	15701817164		$
02	1-111-11111	111111	1111111111	$
03	1-111-11111	111111	1111111111	$
04	1-111-11111	111111	1111111111	$
05	1-111-11111	111111	1111111111	$
06	1-111-11111	111111	1111111111	$
07	1-111-11111	111111	1111111111	$
08	1-111-11111	111111	1111111111	$
09	1-111-11111	111111	1111111111	$
10	1-111-11111	111111	1111111111	$

INITIALS:	DATE	TIME
ADMIN Val	7/24	
CLER		
OPER		

Wiland & Associates, Inc.

219 EAST DAVIS STREET • CULPEPER, VIRGINIA 22701 • TELEPHONE AREA CODE (703) 825-5100

WORK ORDER NUMBER	ACCOUNT NO.	CUSTOMER P.O.	DATE	INVOICE NO.
26599-B	70	RNC-012858	June 25, 1980	27314

SOLD TO:	SHIPPED TO:
Republican National Committee c/o Stephen Winchell & Associates 1990 M Street, N.W., Suite 310 Washington, D. C. 20036 Attention: Clayton Purty	

INVOICE

FUNCTION PERFORMED - DESCRIPTION	QUANTITY	UNIT PRICE	EXTENSION	ACCT. CODE
Merge/Purge #3 - NRCC/RNC				
Process Mail File Input (Including List Conversion and Duplicate Identification Processing)	806,278	$2.10/M	$1,693.18	
Prepare Tape Copy of RCC Unique Records				
Process input records	305,144	.50/M	152.57	
Process output records	305,144	.50/M	152.57	
Shipping and Handling Charges to Return Magnetic Tapes	1 tape	2.50/tp.	2.50	
Tape deposit to be refunded when tapes are returned	2 tapes	20.00/tp.	40.00	

8 3 4 2 0 5 4 7

OK DH

PAID
018715
7-24-80
AMOU

RECEIVED
JUL 23 1980
ACCOUNTING

to Pay

0609307 10876

Pay this and → 2,000.$2

THANK YOU

TERMS: NET 30 DAYS

TOTAL ▶ ~~$2,040.82~~

IF YOUR CHECK WILL BE POSTMARKED ON/OR BEFORE _____

PAY THIS AMOUNT ▶ N/A

ORIGINAL INVOICE

PURCHASE ORDER

REPUBLICAN NATIONAL COMMITTEE
310 FIRST STREET SOUTHEAST • WASHINGTON, D.C. 20003
PHONE 202-484-6500

SHIP TO

Miland & Associates

DATE	DEPARTMENT	BUYER	REQUISITION	TERMS	PURCHASE ORDER NO.
1-18-82					012858

QUANTITY	DESCRIPTION	UNIT	AMOUNT
	Inter-Committee Merge/Purge with the Nat'l Republican Congressional Committee.	2.10/M	$300
	See attached for further instructions.		
	060830/50876		
	600786		

8 3 0 4 0 4 2 0 1 4 1

☐ NOT FOR RESALE ☐ FOR RESALE TAX NUMBER

Katherine M. Oliver
AUTHORIZED SIGNATURE

TRIPLICATE

F-A113 © The Drawing Board, Inc., Box 909, Dallas, Texas

00878	WILAND & ASSOCIATES INC		02/28/80	014350
25625	1,590.88	1,590.88	COMPUTER SVS	

816

Republican National Committee.

310 First Street Southeast, Washington, D.C. 20003.

CHECK NO. 14350

55-408
550

BANK OF VIRGINIA - POTOMAC
5705 LEESBURG PIKE
FALLS CHURCH, VA. 22041

PAY EXACTLY 1,590 DOLLARS AND 68 CENTS

DATE	AMOUNT
02/28/80	014350
	$*****1,590.88

PAY TO THE ORDER OF:
WILAND & ASSOCIATES INC
BOX 899
CULPEPER, VA 22701

NON-NEGOTIABLE

AUTHORIZED SIGNATURE

Tax

8 3 0 4 0 4 2

TOTAL $

PREPARED BY

2/28/80
DATE

ENTERED BY

DATE

REPUBLICAN NATIONAL COMMITTEE

INVOICE DISTRIBUTION

25

VENDOR NAME Wiland + Assoc Inc

INVOICE NUMBER (12) 25625 P.O. NUMBER 010518

DUE DATE 02108180 VENDOR NUMBER 0101017816

EXPLANATION FOR PURPOSE (33) Computer Svcs

		SALES/USE TAX	
INVOICE AMOUNT	$ 4,590.88		A (5%)
		✓	B (½ of 1% at 5%)
ADJUST AMOUNT			C (None)
TOTAL AMOUNT	$	$	Amount Subject to Tax

8304042014 3

DISTRIBUTION

GENERAL LEDGER NUMBER (11)	ALLOCATION CODE (9)	AMOUNT
060930-50875		$
	TOTAL	$

PREPARED BY

2/28/80
DATE

ENTERED BY

1 / 1
DATE

Wiland & Associates, Inc.

219 EAST DAVIS STREET • CULPEPER, VIRGINIA 22701 • TELEPHONE AREA CODE (703) 825-5100

WORK ORDER NUMBER	ACCOUNT NO.	CUSTOMER P.O.	DATE	INVOICE NO.
25006	70	010518	February 8, 1980	25625

SOLD TO:	SHIPPED TO:
Republican National Committee c/o Stephen Winchell & Associates 1990 M Street, N.W., Suite 310 Washington, D. C. 20036 Attention: Clay Purty	Communications Corp. of America One Direct Mail Plaza Boston, Virginia 22713 Attention: Liz Coates

INVOICE

FUNCTION PERFORMED - DESCRIPTION	QUANTITY	UNIT PRICE	EXTENSION	ACCT. CODE
Copy NRCC Uniques for RNC				
Process input records	249,980	$ .25/M	$ 62.50	
Process output records	249,980	.25/M	62.50	
Produce the following:				
RCC Matches for RNC	235,260	4.50/M	1,058.67	
NRSC Matches for RNC	90,490	4.50/M	407.21	

8304042O

PAID 14350 2-29-80

PER

THANK YOU

2/12/80

000930/50875

RECEIVED FEB 29 1980

TERMS: NET 30 DAYS

TOTAL $1,590.88

IF YOUR CHECK WILL BE POSTMARKED ON/OR BEFORE N/A

PAY THIS AMOUNT N/A

ORIGINAL INVOICE

PURCHASE ORDER

REPUBLICAN NATIONAL COMMITTEE
310 FIRST STREET SOUTHEAST • WASHINGTON, D.C. 20003
PHONE 202-484-6500

SHIP TO

Hiland & Associates
Culpeper, Virginia

ATTN: Bob Perrot

CCA
1 Direct Marketing Plaza
Boston, Virginia

ATTN: Liz Coates

DATE	REQUISITIONED BY	VENDOR	TERMS	F.O.B.	PURCHASE ORDER NO.
1-07-88	ASAP	Hiland			010518

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
49,980	Please create a tape of all NRCC unique names and deliver to CCA as soon as possible.	.25M (records in)	$124.99 (total)
	Included on tape should be contributors name, address and HPC.	.25 (records out)	$124.99
	Also, please create the following tapes:		
35,260	1. All RNC/NRCC duplicates	4.50M*	$1,058.67
80,490	2. All RNC/NRSC duplicates		$407.21
	Please deliver these tapes to CCA as soon as possible.		
	*Based on input records. If NRCC and NRSC request duplicate tapes, the cost will be shared.		
	Thanks.		
	060930/000785		
	000786		

☐ NOT FOR RESALE ☐ FOR RESALE TAX NUMBER

AUTHORIZED SIGNATURE

TRIPLICATE

000796 WILAND & ASSOCIATES INC 25/80 014134

25403 1,999.45 1,999.45 MAILING COSTS

816

Republican National Committee.

310 First Street Southeast, Washington, D.C. 20003.

CHECK NO 14134

68-408
560

BANK OF VIRGINIA - POTOMAC
5205 LEESBURG PIKE
FALLS CHURCH, VA 22041

PAY EXACTLY 1,999 DOLLARS AND 45 CENTS

DATE	CHECK NUMBER
02/25/80	014134

AMOUNT
$******1,999.45

PAY TO THE ORDER OF:
WILAND & ASSOCIATES INC
BOX 899
CULPEPER, VA 22701

NON-NEGOTIABLE

AUTHORIZED SIGNATURE

8 3 0 4 0 2

Tax

TOTAL $

MB
PREPARED BY

2/22/80
DATE

ENTERED BY

/ /
DATE

REPUBLICAN NATIONAL COMMITTEE

INVOICE DISTRIBUTION

VENDOR NAME Wiland & associates

INVOICE NUMBER (12) 25403 P.O. NUMBER 10062

DUE DATE 11/23/80 VENDOR NUMBER 0101017816

EXPLANATION FOR PURPOSE (33) ~~HRCC~~ mailing costs

SALES/USE TAX

INVOICE AMOUNT $ 1,999.45 ____ A (5%)

____ B (½ of 1% at 5%)

ADJUST AMOUNT ____ ✓ C (None)

TOTAL AMOUNT $ ____ $ ____ Amount Subject to Tax

8304042001 47

DISTRIBUTION

GENERAL LEDGER NUMBER (11)	ALLOCATION CODE (9)	AMOUNT
060930-50875		$
	TOTAL	$

MB 2/27/80 ____ 1/1

PREPARED BY DATE ENTERED BY DATE

Wiland & Associates, Inc.

[illegible] STREET • CULPEPER, VIRGINIA 22701 • TELEPHONE AREA CODE (703) 825-5100

ACCOUNT NO.	CUSTOMER P.O.	DATE	INVOICE NO.
70	RNC-010062	January 23, 1980	25403

SOLD TO:
Re[illegible]
c/[illegible] Committee
19[illegible]
Wash[illegible] & Associates
Atte[illegible] ., Suite 310
[illegible] 20036
[illegible] Pearson

SHIPPED TO:
Communications Corp. of America
One Direct Mail Plaza
Boston, Virginia 22713
Attention: Liz Coates

INVOICE

DESCRIPTION	QUANTITY	UNIT PRICE	EXTENSION	ACCT. CODE
Inter-Comm[illegible] Purge #2 - RNC				
Process Mail [illegible] Conversion [illegible] (including List Processing) [illegible] Identification	888,029	$2.10/M	$1,864.86	
Tape deposit [illegible] are returned	3 tapes	20.00/tp.	60.00	
Virginia Sales Tax			74.59	

8304020

C230/50875

OK/cp

P14134
2-25-80

PAID

PER

THANK YOU

TERMS: NET 30 DAYS

TOTAL $1,999.45

IF YOUR CHECK WILL BE POSTMARKED ON OR BEFORE _____

PAY THIS AMOUNT N/A

ORIGINAL INVOICE

DUE PURCHASER

PURCHASE ORDER

Republican National Committee.

310 First Street Southeast, Washington, D.C. 20003 (202) 484-6500

TO

Wiland & Associates

Culpeper, VA

ATTN: Bob Perrott

SHIP TO

DATE	DELIVERY DATE	TERMS	F.O.B.	SHIPPED VIA	PURCHASE ORDER NO.
2/13/79	1/8/80				010062

QUANTITY	DESCRIPTION	UNIT	AMOUNT
825M	Inter-Committee Merge/Purge	3.10/M	$2,000.0
	See attached sheet for specifics		apprx.
	For dupdecorde tapes--NRCC/RNC and NRSC/RNC	4.50/M	
	Exact quantities to be confirmed		

060930/50875

000786

NOT FOR RESALE ☐ FOR RESALE TAX NUMBER

TRIPLICATE

OUR PURCHASE ORDER NUMBER

WILAND & ASSOCIATES INC 09/17/80 002747

27543 16754.99 .00 16754.99 PRINTING SVS 082085

Republican National Committee

310 First Street Southeast, Washington, D.C. 20003

CHECK NO 20943

60-408
360

BANK OF VIRGINIA - POTOMAC
7305 LEESBURG PIKE
FALLS CHURCH VA 22041

SIXTEEN THOUSAND SEVEN HUNDRED FIFTY FOUR DOLLARS
99 CENTS **********

CHECK DATE	CHECK NUMBER
09/17/80	002747

PAY TO THE ORDER OF:
WILAND & ASSOCIATES INC
BOX 899
CULPEPER, VA 22701

$****16,754.99

NON-NEGOTIABLE

AUTHORIZED SIGNATURE

Pymt. Da
-80
E AMT
77.49
77.50

05 /1/- - $
06 /1/- - $
07 /1/- - $
08 /1/- - $
09 /1/- - $
10 /1/- - $

INITIALS: DATE: TIME:

ADMIN Done 9-17
TLER 9-17
CPER Done 9-17

return check to:

RONALD REAGAN

September 1980

Dear Fellow Citizen:

This is a year of great opportunity for the Republican Party. It is a year in which we can provide the leadership, direction and constructive solutions that have been lacking in this country for too long.

Today, many people are out of work. Many have seen their savings eaten away by inflation. They have watched as our dependence on foreign oil has increased. And they wonder whether our nation can survive the Democrats' defense and foreign policies.

By almost any measure, the Democrats, who have controlled Congress for 25 years, have failed to uphold the trust so many Americans placed in them. Clearly, it's time for responsible change and for restoring the trust of the American people in their government. I believe the Republican Party can provide that change and restore that trust.

The Republican program for strengthening our economy is based on growth and productivity, on providing relief for taxpaying citizens and on getting Americans back to work.

Our foreign policy calls for the strengthening of our defense capability and working for peace to ensure that the safety of our people can never be threatened successfully by a hostile foreign power.

And, while stressing the importance of energy conservation, our energy program will get Americans back to work producing more energy -- more oil, more coal and more natural gas. All of these sources are available beneath our land and off our shores and offer great potential. But that potential must be developed.

Republicans have the issues to defeat the Democrats in November. But having the issues will not be enough.

8304042015I

Despite what the polls show, the Democratic Party will be a formidable opponent this Fall. They have the massive powers of incumbency, including an ability to dominate the news and to disperse federal patronage. And, as we have seen, there has been no hesitancy to use these powers.

As concerned Americans, however, we have one resource -- the most important one, in my opinion -- which the Democrats do not have. That resource is people. The people of this great land clearly want a change and agree with us on the issues.

You can help bring about this change by letting your voice be heard in this year's elections in New Hampshire. You can help in your town and in your state to get our country back on the right track.

I'm writing to ask you to help our cause in New Hampshire this year.

First, support our candidate for the U.S. Senate. Your U.S. Senator can play a major role in the process of confirming Presidential appointees -- in committee, in floor debate and, with a Republican President, through the custom of Senatorial courtesy.

Also, support our two candidates for the House of Representatives. As you know, all tax legislation originates in the House; so these people will have a lot to say about the taxes you must pay.

Second, give our party and its candidates your personal, active help: participate in a campaign of your choice. Please fill out the enclosed card and drop it in the mail; postage is paid. When the New Hampshire Republican State Committee receives your card, they will be in touch with you and discuss how you can best help the ticket.

New Hampshire means a lot to the Republican Party. So I hope you will help me and other Republican candidates realize our objective of bringing about the type of change in government I believe we all want.

Sincerely,

Ronald Reagan

Ronald Reagan

Paid for by the Republican National Committee in behalf of the New Hampshire Republican State Committee

8304042015 2

Republican
National
Committee

Nov. 20, 1980

To: Don Ivers
House Counsel

From: Barbara Hildenbrand
Voter Programs

Per your request for documents requested by the Reagan Bush Committee. We were asked to supply a copy of the voter registration and absentee ballot requirements for all states. (Copies of documents enclosed). For a listing of State Board of Elections offices (copy enclosed). For a briefing paper on Voter Registration for the Reagan/Anderson debate (copy enclosed).

To the best of my knowledge that is the total input of information from Voter Programs to the Reagan Bush Committee.

8304042015

FACTS

- Voter participation in Presidential elections has always been low.

  --Not until 1928 did more than half the VAP vote, even though women gained suffrage in 1920.

  --In 1976, 46% of VAP did not vote: 65 million

  --Currently half of 18-29 year olds unregistered

  --Non-voters are younger, slightly more likely to be black, slightly poorer, slightly less educated than voters.

- Decline in participation: Election laws and procedures as barriers vs. apathy and/or alienation from political process.

- In 1977 Carter proposed election day registration, removing safeguards:

  --Pre-registration designed primarily to prevent fraud. Candidates, parties, officials require time to check rolls;

  --Registration insures voter actually resides in election district and thus eligible to vote on local matters. Note, also, individual votes have significantly more "weight" in local races;

  and creating atmosphere for unnecessary burdens:

  --Could delay reporting of outcome until election irregularities and challenges resolved in close elections;

  --Long lines delaying voters and I.D. problems could occur.

- Five (5) States with election day registration have shown little increase in participation. (Minn., Wisc., Ore., Maine, & N.D.)

- Proposed 1977 Ohio Constitutional amendment to require registration 30 days in advance of an election won by 62%

- Survey research indicates Carter proposal of little significance.

  --Preponderence of data indicates only small proportion of non-voting due to registration and voting requirements.

  --Surveys indicate lack of interest in and/or association with, political and governmental processes are the major cause of non-voting.

- [illegible] vote doesn't count, and/or they see no connection between politics and their personal lives.

8304042015 4

VOTER PARTICIPATION

QUESTION

To what do you attribute the general decline in voter participation?

SETTING: Just over 50% voting age population (VAP) will elect President

-- 71% VAP registered--only 8 of 10 will vote
-- Turnout steadily declined since 1960
-- 54.4% turnout in 1976 (28 year low)

Carter Vulnerable: Supports universal election day registration --

-- Strong possibility of election fraud
-- Challenges and red tape could leave outcome in limbo

Reagan Position: Physical/legal restraints not major cause decline

-- Present system working well, needs fine tuning by States
-- Failure to vote attitudinal not socioeconomic
-- Creditable candidates and articulation of relevant issues key

Reagan Proposals: Increase participation, limit opportunity fraud

- Expanded use post card registration
  - -- Permit freer dissemination cards (Boy Scouts, Parties, LWV)
  - -- Close post card registration 30 days out (verification)
- Increase use of absentee ballots
  - -- Automatic Social Security, etc. recipients (age)
  - -- Convient source application form (banks, Post Office, etc.)
  - -- Little opportunity fraud

8304042015S

Republican Governors Association
310 First Street, S.E., Washington, D.C. 20003 Phone (202) 484-6620

Chairman
Honorable Richard A. Snelling
Governor of Vermont
Vice Chairman
Honorable John N. Dalton
Governor of Virginia

Executive Director
Ron Rietdorf

Fred Radewagen
Director
Resource Development

October 13, 1980

TO: Governor Reagan

FROM: Dick Snelling

SUBJECT: 1980 Gubernatorial Races

I appreciated your call last week on the status of our 12 gubernatorial races this fall. As we discussed, I am frankly very optimistic about our chances in several of them. Here is a thumbnail sketch of where we stand as this is written:

Indiana. Lt. Governor Bob Orr, our nominee, has the edge with approximately a 10-12 point lead. The opponent is wealthy and can be expected to launch an eleventh hour blitz, but Orr is running a supurb campaign and, if he doesn't let his guard down, should hold the state-house for us.

Missouri. As you know Kit Bond narrowly lost in an upset in 1976. He's corrected his errors and has a first class organization. He's beating Governor Teasdale by 12 or 13 points right now. A strong win here will greatly help your campaign as the state appears to be tight in the presidential race.

Washington. You are running well here but the lateness of the gubernatorial primary (Sept. 16) and the unexpected defeat of Governor Dixy Lee Ray, has meant a "retooling" of our campaign against a new opponent. The Democrat, State Senator Jim McDermott is not in tune with the electorate and won primarily on a backlash against Governor Ray. If we can educate the voters on McDermott's stands, we will win. Our nominee, John Spellman, was grateful that you were able to go to Washington and campaign with him recently. It was a big boost.

Other Western States. We have three other races in the West, all of which you are expected to carry by sizable margins. That will really help our nominees: Al Olson (North Dakota), Jack Ramirez (Montana), and Bob Wright (Utah). All three are top quality candidates and are running strong races. We are closing the gap in all of them and should win at least two.

The South. We are giving the Democrat incumbents in North Carolina and Arkansas a much tougher time than they ever expected. We're behind in both right now, but not out of it.

CONFIDENTIAL

8304042015 6

The East. Two of your former colleagues, Arch Moore (West Virginia) and Mel Thomson (New Hampshire) are waging spirited comeback bids. Between them they have previously won five gubernatorial elections. We have an excellent opportunity to make that seven on November 4. Buddy Cianci, the popular mayor of Providence, is in a real battle with Gov. Garrahy in Rhode Island. Finally, Pete du Pont (Delaware) appears well ahead in his contest and I am hopeful that the voters of Vermont will give me the honor of serving with a Republican President.

In summary, the outcome of several races depends entirely on whether or not we can raise, in the last two weeks of the campaign, over $180,000. This is really not a lot when you realize it's going to be used in so many races. But I think it can make the difference in the ten contests that right now are tossups.

I know you are concerned that we control as many statehouses as possible to give the Republican Party additional protection against the gerrymandering of congressional and legislative district lines.

Let me assure you that the RGA will do everything our resources will permit to make sure this gerrymandering is prevented.

Please let me know if you need further details.

CONFIDENTIAL

8304042001 57

REAGAN for PRESIDENT

901 South Highland Street
Arlington, Virginia 22204
(703) 685-3400

8304042013 8

October 11, 1980

Mr. Richard A. Snelling
Chairman
Republican Governors Association
310 First Street, S.E.
Washington, D. C. 20003

Dear Mr. Snelling:

Thank you for your recent letter inviting Governor and Mrs. Reagan to attend the Republican Governors Association's Winter Conference in Philadelphia, November 16-18.

Unfortunately, it is not possible to respond affirmatively to invitations for the post-election period. However, you may be sure that full consideration will be given to your invitation as soon as their plans become firm following the election. If it becomes apparent that they will be able to join you, I shall be pleased to contact you promptly.

Governor and Mrs. Reagan regret that no definite commitment can be made at this time, and have asked me to extend their best wishes to you.

Sincerely,

Kay Odell

Kay Odell
Communications Director
Scheduling Division

Reagan for President, Inc. ... Paul Laxalt, Chairman ... Bay Buchanan, Treasurer

RONALD REAGAN

October 16, 1980

Mr. Ross E. Rowland, Jr.
Moor Broker Associates
160 Broadway, Suite 1204
New York, New York 10048

Dear Ross:

While much attention has been focused on the national election, gubernatorial campaigns throughout the country are as important to each state as the Presidential race is to our nation.

In this regard, I have two urgent requests. The first is that you read the enclosed status report on gubernatorial races across the country, which was sent to me by Dick Snelling, Chairman of the Republican Governors Association..

I'm sending you a copy because you're a member of the Republican Governors Club and I know you share my views on the importance of these gubernatorial races.

When Governor Snelling told me about the Republican Governors Club and the level of involvement needed to become a member, I was impressed. I was impressed because all too often the races for the Senate and Congress overshadow the races for governor.

And yet, the governors of our fifty states are important because they have the power to raise or veto taxes, increase regulation, promote or discourage new business, cause inflation through deficit spending and many other things which few people are even aware of.

Being a former governor, I know what can be done to eliminate wasteful programs and high taxes. I know because that's exactly what I did.

My own campaign is centered around two major themes. One is to strengthen our country's national defense, and other is to create more jobs in the private sector, while reducing the waste and size of our federal government. This can't be accomplished without assistance from our governors.

This summer I met with the Republican governors in Chicago and told them that their help would be needed to create new programs and policies to replace the failed policies of the past which have produced inflation, recession and despair.

You, as a member of the Republican Governors Club, can be directly involved in this process.

8304201 39

8304201 6C

As a member of the Republican Governors Club, you are invited to participate in the first working session to be held prior to the Republican Governors Conference. This session will take place Sunday, November 16th in Philadelphia, and you will be encouraged to give your ideas and offer suggestions and advice on the vital issues facing our country today. I hope you will be able to attend.

You're going to be on the cutting edge of a new beginning for our nation. But that new beginning won't be successful unless more Republican governors are elected this year. Your help is needed now if that's going to happen.

Look at the memo I've enclosed. You can see how close many of these gubernatorial races are and how just a few extra dollars for television and radio advertising could make the difference between victory and defeat.

Which brings me to my second request. I urge you to renew your membership in the Republican Governors Club today.

There is so little time between now and election day, and the RGA needs $180,000 in the next twelve days to have an impact on those races in the last two weeks of the campaign. Of the thirteen governors' races this year, ten have Democrats trying to retain control of the statehouse. Those ten races are the closest ones and, if we are going to win them, the money is needed <u>now</u>.

That's why I'm asking you to renew today and why I'm asking you one more favor -- that you recruit one additional member for the Governors Club, because every dollar is crucial in these too-close-to-call gubernatorial races.

Having as many Republican governors as possible is a crucial element in Republican plans for reducing the size of our federal government. Your renewal today in the Governors Club is vital if we are to have that badly needed support in the years ahead.

I'm counting on you to help make our country's new beginning a successful one.

Sincerely,

Ronald Reagan

Ronald Reagan

P.S. Please get back to me today. The RGA needs to know how much money they're going to be spending in those last crucial days of the campaign.

REPLY MEMO

TO: Ronald Reagan
310 1st SE.
Washington D.C.

FROM: Mr. Ross E. Rowland, Jr.
Moor Broker Associates
160 Broadway, Suite 1204
New York, New York 10048

Governor Reagan,

I'm renewing my membership in the Republican Governor's Club today.

The governors' races are too close to let victory slip away at the last minute.

My renewal check for $2,000 is enclosed.

____ I'm also recruiting one new member for the Club as you asked.

The name is-

_____

_____

_____

____ Because time is so vital I have already wired my renewal check to you - this is confirmation.

____ I will be attending the Republican Governors Conference in Philadelphia, and will also be attending the working session on Sunday, November 16th.

8304042016 1

Sent to all
Club members

8304042001652

RONALD REAGAN
Washington, D.C.

Dear Friend:

As you know, I am determined to replace the Carter-Mondale administration with one that will have the strong leadership and vision to get this country moving forward again.

But the type of responsible progress I believe we both want will require changes at all levels of government, not just the federal.

And that's why I am writing to ask you to help me in my efforts to assist the Republican Governors Association.

I am writing on behalf of the RGA to tell you why I believe your support is so critical. I could give you dozens of reasons. Here are just three:

First, the Republican Governors Association doesn't just scatter money around. These are professionals who know where the money can best be spent and how it can be used most effectively.

Ask Governor Dave Treen about the importance of the RGA's help in 1979 when he broke the Democratic control of the Louisiana governorship which had lasted more than 100 years.

Timely, targeted support helped Bill Clements of Texas do the same thing just the year before.

These are tangible, specific results that demonstrate that your money is helping provide new leadership for state government in America.

Second, we have never had better or more specific opportunities -- opportunities for substantial change -- than in 1980. Thirteen states will elect governors this fall. If we retain our three and elect six of the others, Republicans will govern half the states in the country. Think about that.

And third, you might say, "I'm only interested in my state." But wait. I'm talking about our country.

Never underestimate the national power of governors.

Don't forget that they share constituencies with the hundreds of Congressmen. Their clout in Washington is enormous.

8304042016 3

I'm determined to restore responsible leadership and direction to the office of President and to our nation. And I need your support to do so.

But remember that to really turn our country around will require competent leadership at all levels of government.

From my two terms as Governor of California, I know how effective the work of the Republican Governors Association is. I urge you to help the RGA continue its vital role through your own personal support.

Please help us. Your contribution to the RGA today -- not later on -- will enable us to provide vital support to our candidates. Candidates who will run strong and who will win big in November.

Remember: your contribution of $15, $25, $50, $100 or whatever you can give will be carefully targeted to those races where it can do the most good -- into races we can win and where these extra dollars can mean the difference.

Sincerely,

Ronald Reagan

RONALD REAGAN

P.S. I need your help today to insure our raising an additional $96,000. This will go immediately into key states where our conservative candidate has an outstanding chance to defeat a liberal Democrat.

If I can hear back from you by September 19th with your maximum contribution, I'll appreciate it.

R.R.

8304042016

8304042016 5

Dear Governor Rea[illegible]
You can count on me. I want to join your effort to provide more responsible leadership in the states by electing more Republican Governors.
Here's my contribution:
☐ $15 ☐ $25 ☐ $50 ☐ $100 ☐ $250 ☐ $_____ Other

04

MR WILLIAM BRIGGS
3014 SEMINARY AVE
RICHMOND VA 23227

[illegible]RGA is permitted by law to accept personal, political action committee and corporate contributions. Please make payable to:
Republican Governors Association.

My check is:
☐ Corporate ☐ Individual
☐ Political Action Committee

Some state laws require additional information from individual contributors. In order to comply with these statutes, we request the following information:

Occupation _____

Principal Place of Business _____

Address _____

City _____ State _____ Zip _____

NO POSTAGE NECESSARY IF MAILED IN THE UNITED STATES

BUSINESS REPLY MAIL
FIRST CLASS PERMIT NO 72870 WASHINGTON D.C.
POSTAGE WILL BE PAID BY ADDRESSEE

RONALD REAGAN
Republican Governors Association
P.O. Box 24313
Washington D.C. 20024

8304042001566

[illegible]LD REAGAN
[illegible]overnors Association

[illegible] Authority of the
[illegible] National Committee
[illegible]E. Washington, D.C. 20003

Dear Governor Re[redacted];
You can count on me! I want to join your effort to provide more responsible leadership in the states by electing more Republican Governors.
Here's my contribution:
☐ $15 ☐ $25 ☐ $50 ☐ $100 ☐ $250 ☐ $_____ Other

MR WILLIAM BRIGGS 04
3014 SEMINARY AVE
RICHMOND VA 23227

The RGA is permitted by law to accept personal, political action committee and corporate contributions. Please make payable to:
Republican Governors Association.

My check is:
☐ Corporate ☒ Individual
☐ Political Action Committee

Some state laws require additional information from individual contributors. In order to comply with these statutes, we request the following information:

Occupation _____

Principal Place of Business _____

Address _____

City _____ State _____ Zip _____

NO POSTAGE NECESSARY IF MAILED IN THE UNITED STATES

BUSINESS REPLY MAIL
FIRST CLASS PERMIT NO 72870 WASHINGTON D.C.
POSTAGE WILL BE PAID BY ADDRESSEE

RONALD REAGAN
Republican Governors Association
P.O. Box 24313
Washington D.C. 20024

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the
mittee
D.C. 20003

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RONALD REAGAN
Republican Governors Association

Under the Authority of the
Republican National Committee
310 First Street, S.E. Washington, D.C. 20003

C0002

AMERICANS FOR REAGAN

UNITED STATES SENATOR JESSE HELMS, HONORARY CHAIRMAN

C00132

Miss Ann Nimmer
Republican National Committee
310 First Street, Southeast
PO Box 1900
Washington, DC 20013

Dear Ann:

Enclosed please find checks amounting to $140 that were sent to us in error. As you can see, the contributor made the checks payable to the Republican National Committee but mailed them in the Americans for Reagan reply envelopes.

These can be deposited to the proper account now.

Sincerely,

Paul Reynolds kd

Paul D. Reynolds, III

PDR:kwd

Enclosures

8304201 9

AMERICANS FOR REAGAN

U. S. SENATOR JESSE HELMS P. O. BOX 18848 RALEIGH, N. C. 27619

Miss Ann Nimmer
Republican National Committee
310 First Street, Southeast
PO Box 1900
Washington, DC 20013

FEDERAL ELECTION COMMISSION

Account Number

The above-described material was removed from this file pursuant to the following exemption provided in the Freedom of Information Act, 5 U.S.C. Section 552(b):

____	(1) Classified Information	____	(6) Personal privacy
____	(2) Internal rules and practices	____	(7) Investigatory files
____	(3) Exempted by other statute	X	(8) Banking Information
____	(4) Trade secrets and commercial or financial information	____	(9) Well Information (geographic or geophysical)
____	(5) Internal Documents		

Signed Irene B. Weisenbaum

Date 6/22/83

FEC 9-21-77

83040420170

REPUBLICAN NATIONAL FINANCE COMMITTEE
310 FIRST STREET, SE.
WASHINGTON, D.C. 20003

1446

9/11/ 19 79 68-406/560 8

PAY TO THE ORDER OF Reagan for President $****500.00***

Five hundred dollars and no cents********** DOLLARS

Bank of Virginia
Crystal City Office

Contribution- Howard Kelsey

Jane A. Cobb
Finance Manager

"0001446" "0560-0408" 651-7/2064 3

REAGAN-BUSH CAMPAIGN PROJECT

DATE	LETTER AR/GB	REQUESTER	REQUEST	HOW HANDLED
9-4	B Clark	Bill Timmons	compliment News Summary Digest	-
9-5	B Clark	Ed Gray's sec Becky Bteining	compliment N.D.T.S (1 short Mod) of 5/80	-
9-5	B Clark	Deaver + Hannaford	article Phil Ing re: as foreign Reagan aides not agents	sent copy
9-9	M Sawyer	L. Gritzmacher	articles on Citizens Party	sent copy
9-9	B Clark	to Anne Wagner	increase Digest Wrap-up to 6 weekend	checked w/ will do
9-10	B. Clark	Tony Dolan	NYT 5-21-76 Vt conn was exit 9.7.80 by Wm. Sullivan	microfilm
9-10	M. Sawyer	Lucy Gritzmacher	Sunday LA Times story	raw clip
9-10	B Clark	Lucy Gritzmacher	[illegible]	"Dream Dea WSJ 11-19-79
9-10	B Clark	Tony Dolan	BaH. Sun 5-26-76 Quote	microfilm 7-28-6-3
9-11	B Clark	Larry Speidler	articles on 191 Iranian St	raw clip

8304042017

9:16	B Clark	Lucy Gritzmacher 3774	6/30/80 Jack Anderson refers to earlier col. on grant to state primacy status	6-18-80 micorfilm
9-18	B Clark	Martha Holdridge	status of Tellico Dam	C.Q.
9-18	B Clark	Leslie Sarg 3748	art. on Anderson int. by BBC Jamison NBC in July	Anderson f
9-19	M. Sawyer	Martha Holdridge	Voting Record on crime and Gun Control Bill	C.Q.
9-19	B Clark	Tony Dolan	transcript J Anderson speech in S.F. Commonwealth Club	called Comm to send tra
9-19	B Clark	Leslie Sarg 3687	Lee May Columns LA Times	
9-22	B Clark	Kump Hacshaw	Headlines from 7/21, 7/26, 8/2	raw clip fil
9-23	M. Sawyer	MARtha Holdridge	Global 2000 Report, clips	raw clips and R (LAT 9-11-80)
9-23	B Clark	Martha Holdridge	article on "Marriage Tax"	raw clip fil
9-23	M. Sawyer	MARtha Holdridge	article on "Brezinski vs Thurmond" (raw clip)
9-23	B Clark	Fan Snodgress	two weeks clips on Nancy Reagan	raw clip fil
9-24	B Clark	Gary Bowers 3702	Carter Iran quote saying using military force	camp quote
9-24	B Clark	Lucy Gritzmacher	7/12/77 Carter use term "rip-off" list about drug of nat goo	microfilm LAT 7/27/77
9-26	B Clark	Roper 3470	9-21-80 Dallas Morning News id. indirect Reagan quote	newspaper
9-26	B Clark	Martha Holdridge	NY Times 6/4/76 Reagan quote on Rhodesia	microfilm
9-26	M. Sawyer	Julia Lorge	L.A. article on Chile FM dictator	microfilm
9-26	M. Sawyer	Julia Lorge	L.A. article on Carter	microfilm
9-26	M. Sawyer	City Traffic	L.A. article on Reagan Smith	microfilm

10-1	B Clark	" "	5-1-79 [illegible]	[illegible]
10-1	B Clark	Martha Holdridge	[illegible]	[illegible]
10-2	M Sawyer	Martha Holdridge	Time 9-22-80 [illegible]	library
10-2	M Sawyer	Martha Holdridge	Wash Post 9-24-80 Reagan in Cairo	raw clips
10-2	B Clark	JoAnn Cradd	NYT Reagan-Judge cut today pool missing	read over
10-7	B Clark	Martha Holdridge	NYT March 1 ADA on rejected Russian	VOS micro
10-8	P. Ijams	Angela Raish	Wm. Safire cut on RR cabinet	NYT 9-29-80
		" "	AP story today on C. Andrew	wire
10-14	B Clark	Martha Holdridge	Did Mucahe endorse carter	pres. doc
10-15	B Clark	Dany Bauer	Jack and 8/12 Castro ind. carter	raw clips
10-3	B Clark	[illegible]	[illegible] NYT 7-79	microfilm
10-22	B. Clark	" "	all art. on carter cabinet shifts	micro f.lm
10-23	B. Clark	Press Office	2 RR articles to include in Digest II	
10-23	B Clark	Martha Holdridge	State Dept statement on shah entering NY Hospital	microfilm
10-24	B Clark	Bev Eshleman	2:30 Reagan [illegible]	Jim Smith
			4-80 B-h [illegible]	[illegible]
	B Clark	Bev Eshleman	1:30 [illegible]	[illegible]
			[illegible]	
10-24	B Clark	[illegible]	[illegible]	[illegible]

8304201741

DATE	LETTER WRITER	LETTER RECEIVED BY	CONTENT	WHEREABOUTS
D-27	B Clark	Ben Eshleman	2nd 76 on Reagan John Sears at NY Times Mag.	9/19/76 microfilm
D-25	B Clark	Martha Holdridge	Reagan's stand on ED not in line with Kemp theory	wire shut DC
D-23	B Clark	" "	Rich Bond Reagan Kemp	microfilm
D-23	B Clark	Kevin Hopkins	Cont. Principles of 1/31/76	microfilm
D-29	B Clark	Ben Eshleman	2-1-80 NY Times Reagan quote on A-Bomb	microfilm
D-29	B Clark	Martha Holdridge	Bus. Week on Kemp-Roth bill	mags.
D-29	B Clark	" "	WSJ 2-1-80 Arlington art.	Lib. of Cong
D-29	B Clark	Ben Eshleman 3748	2-1-80 WP art. RR on A-bomb	" " "
D-30	B Clark	Misty Church	8-25-80 Fortune 50 sec.	microfilm

8304042017 5

DATE	STAFFER	RP/GB	REQUESTER	REQUEST	ITEM PROVIDED
10/	D	P		Congress re weapons	Kaiser file
				circuits for background	coordinated
				writing info before	w/ Phil &
				debate tonight.	by mssg *
10/28	"	Jim		NYT articles re Arabs/Carter.	Sent
		Wilson		~~NYT articles re Carter~~	
				quote 5 mos. ago re	Obtained in
				Khomeini not releasing	NYT microf
				hostages til after election	& sent
10/28	"	Pinkerton		Info on Carter's auto aid	Sent info w
				pkg. July 80.	to Phil for p
					discussion
					* Also sent
					RNC Library
					(XX)

8304042017 6

DATE	STAFFER FR/CB	REQUESTER	REQUEST	FULFILLED
10/27	Dawson	Ken Robinson	[illegible] articles showing economists predictions	[illegible] on Microcode, requested for Advance staff by msg. today
10/27	"	Fritzmeier	John Sears article from NYT Magazine 1976.	Provided from micro film
10/27	"	Ben Eschleman	Steven Hess column re Ford Adm. appointments ('77)	We don't have coordinated. Ha R.B contact to arrange msg. delivery.
10/27	"	Holdridge (for Bill Galvin, speechwriter)	1) Carter quote re Jackson's "warlike attitudes" 2) C. re Johnson lying, stealing & dictating truth. 3) C. re Kennedy remarks "very damaging to our country"	Provided from Fa - File
10/27	"	Holdridge	Vance commencement address at Harvard '80.	Provided from Vital Speeches

DATE	STAFFER	PROB	REQUESTER	REQUEST	HOW HANDLED
3/7	AA	Regis		Cardiac problems, needs pacemaker and pacemaker appliances, Dr. Anderson treatment	referred to physician over
3/10	AA	Peggy Wallace		Dr. Anderson's address or telephone info.	not given
3/11	AA	Rich Bennitage		Anderson info	picked up
3/12	AA	Charlie Kuppin		Anderson info.	

8304042017 8

DATE	STAFFER	FR/CB	REQUESTER	REQUEST	HOW RESOLVED
1/9	Grace	[illegible]	[illegible]	[illegible]	[illegible]
1/10	Grace	Mercy Church	Alaska Lands Bill		Pos. CQ Pos. documents

DATE	STAFFER	FB/CB	REQUESTER	REQUEST	HOW HANDLED
8/5	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
8/6	Phillips			Wanted Carter" on the economy	got back with
8/8	Tony Dolan			Continuation of prior conversation	(Given Liz Burn
8/10	Burns (Timmons)			Re: Economic IT	Waiting for answer
8/11	Tony Dolan			Wanted mailing labels	Ready For - called for

8304020

8300420181

1/10	Date	Log Book	Approximate Volume	Initials

80000

DATE	WRITER	ADDRESSEE	REQUEST	HOW HANDLED
9/13	Clegg	[illegible]	Dirt on [illegible]	[illegible]
9/13	Clegg	[illegible]	⟷ [illegible]	wrote same
9/13	Clegg	[illegible]	⟷ [illegible]	am writing (Col)
9/11	Clegg	[illegible]	[illegible]	sent same
9/12	Clegg	Jim Pinkerton	wanted [illegible] copy of IC Record	sent same
9/12	Clegg	Hugh Bang	article for Johnson Control newsletter on energy	wrote same
9/11-12	Clegg	Tony Dolan, Hugh Bang	Hugh Bang (Civiletti aid)	received same

8304042018

80000

9/5	Gilden	[illegible]	[illegible]	[illegible]
9/5	Gilden	Mark Clark?	[illegible]	[illegible]
9/6	Gilden	Lyn ?	how to operate Quip	"
9/8	Gilden	[illegible]	press conference prep	"
9/8	"	Robin Grey	" " "	"
9/9	"	Towery	Charlie Walker actual pc setup	done
9/9	"	Clark/Sunga	set up Jim Baker PC/mops	done
9/11	"	Kenp Hartman	come set up TV antenna	"Please call Charlie, he answered
9/11	"	Lorene Laing	sound system for Atoka	"
9/11	"	Doreen Steeves	Atoka prep	"
9/12	"	Nancy Christie	can we do 3/4" tape	yes
9/12	"	" "	20 secs later; can you do it today?	"
9/12	"	" "	do 1 tub of CBS show	done

8304042019

8304042018

9-4	B Clark	Bill Timmons	compliment Wms Digest Summary	-
9-5	B Clark	Ed Gray's sec. Becky Steining	compliment WDS (Lobert Non)	-
9-5	B Clark	Denver Harnaford	article Phil Ing. reg assignment 9/5/80 Reagan address	sent copy
9-9	M Sawyer	L. Gritzmacher	articles on Citizens Party	sent copy
9-9	B Clark	LoAnne Wagner	increase Digest Wrap-up to 8 Weddard	checked w/ Lan will do
9-10	B. Clark	Tony Dolan	NYT 5.21.76 Vtnam was cent quote by Wm. Sullivan 9.7.80	microfilm
9-10	M. Sawyer	Lucy Gritzmacher	Sunday LAT news story late 79 early 80 WSJ article	raw clip file
9-10	B Clark	Lucy Gritzmacher	young families can't buy homes vietnam vet	"Dream Deferr WST 11-19-79 pl
9-10	B Clark	Tony Dolan	Balt. Sun 5.26.76 Quote quoted at WH	microfilm 7.28.6.5
8-11	B Clark	Larry Seidler	articles on 91 Iranian St.	raw clip fil

8304042

TIME	SHIFFER FR/OB	SEMESTER	INTEREST	INTERVIEW
1	" "	Bob Fairbanks	Housing	" "
1	" "	Bob Fairbanks	Section 8 Housing	" "
12	" "	Mark Walker	Final Place	" "
		Office	TEC Report	

C00021

DATE	SUBMITTER	RR/SB REQUESTER	REQUEST	NOW HANDLED
9	Nancy S.	Ed Gray	All-Region quotes	Found-Delivered
10	Nancy S.	[illegible]	Nathan quotes on CD issues	Found-Delivered (late)
11	E. Hess	Don Chen/Chelsea Clark	JC Recorder Welfare + Minorities	Found-Delivered
12	E. Hess	Daniel Boquist/Terry Dolan	Date on RR & JC for acceptance of League of Women Voters To Debate	Discussed - materials on related matter had been sent & other debate quotes by JC delivered.
12	Nancy S.	Ben Estelman	JC speeches on debate topic	Found-Delivered

8304040067

S70063

DATE	STAFFER	RP/SB	REQUESTER	REQUEST	HOW HANDLED
9-8	B. Sheaffer	[illegible]		- Rundown per [illegible]	[illegible]
9-9	B. Sheaffer	Bonnie Brown		To cut down delivery of Digital Tapes - Relayed to S	
9-11	B. Sheaffer	Debra Bellows		- Q's re "JCER" question, LWV 9/24	- Forwarded
9-11	B. Sheaffer	Mary Galle		- Check record of JBA	Forwarded to

8304042019E

83040420139

10/1	"	T. Pinkerton	Sec. Sec.	
10/1	"	Tim Pinkerton	Sec. Sec.	
10/2	"	Tim Pinkerton	[illegible]	"
10/2	"	Tim Pinkerton	[illegible]	"
10/4	"	Anne Pederson	Center rec. blacks	guests

8304042019O

DATE	STAFFER	RR/CB	REQUESTER	REQUEST	ION RE
9/[illegible]/80	Lacaro	Eldridge - Library		Per capita state & local taxes for Ga. + Ca. in 1966, 70 + 75.	Provided info
10/1	"	Geiermacher - Lib.		Geographical info on Manhattan Island	Provid
10/1	"	Eldridge - Library		Copy of "The Politics of Merit Selection" from Natl Review	Sent
10/2	"	Anne Brooks Operations		Copy of TNR endorsement article (of Anderson).	Sent
10/3	"	Martha Library		Current home addresses for Kurt Stein, Elbridge Durbrow, Brent Scowcroft	Provided
10/3	"	Leslie Song Research		Dates of Carter foreign policy speeches at Notre Dame & Duke University.	Provided
10/3	"	Henry Catto (Former Amb. to Ford Adm.)		Names of all ambassadors appointed during Nixon + Ford Adms. (Putting together "Ambassadors for Reagan" support group)	Working
10/3.	"	Lacey Library		Need "strong praise" by Carter of Paul Volcker	Dictated Of Catto Ltr Vol remarks

8304042019 1

DATE	STAFFER BR/OB	REQUESTER	REQUEST (In Chronological Order)	HOW HANDLED
1/1	Fenton	Dunn, Bryant	Unity Slate list invites by Candidate	

8304042001 92

9-18	B Clark	Lucy Gritzmacher	re earlier cl...on granddaughter	6-12-80 incorp
9-18	B Clark	Martha Holdridge 2774	status of Tellico Dam	C.Q
9-18	B Clark	Leslie Sorg 3748	art. on Anderson int...by Bob Jamison NBC in July	Anderson
9-19	M. Sawyer	Martha Holdridge	Voting Record on Crime and Gun Control Bill	C.Q
9-19	B Clark	Tony Dolan	transcript J. Anderson speech in S.F Commonwealth Club	called C to send
9-19	B Clark	Leslie Sorg	Lee May Columns LA Times	
9-22	B Clark	Kemp Harshman 3687	Head lines from 7/21, 7/26, 8/2	raw cli
9-23	M. Sawyer	Martha Holdridge	Global-2000 Report, clips	rawclips (LAT
9-23	B Clark	Martha Holdridge	article on "Marriage Tax"	raw clip
9-23	M. Sawyer	Martha Holdridge	article on "Brzezinski vs Thurmond"	(raw cl
9-23	B Clark	Fan Snodgrass	this wks clips on Nancy Reagan	raw cli
9-24	B Clark	Gary Bowers 3702	Carter Iran quotes saying using military force	comp qu
9-24	B Clark	Lucy Gritzmacher	7/12/77 list Carter use term "rip-off" about drug of nat. gas	microfil LAT 7/
9-25	B Clark	Leslie Sorg	Ford position of unfair tax in '35	microfil
9-26	B Clark	Lucy Gritzmacher	dates of NYT art. on Reagan tax	Facts on
9-26	B Clark	Lucy Gritzmacher	Wash Post 9/2/80 Reagan-Kraft	raw clip
9-26	B Clark	Roper 3470	9-21-80 Dallas Morning News - Reagan ed. endorse	newsp
9-26	B Clark	Martha Holdridge	NY Times 6/4/76 Reagan quote on Rhodesia	micro
9-26	M Sawyer	Leslie Sorg	WP article on Carter Fed dollar	micro
9-29	M Sawyer	Leslie Sorg	WP article on Carter	micro
9-29	M Sawyer	Ally Taffey	WT article on Reagan's tax	micro

C0007

DATE	STAFFER	BR/EB	REQUESTOR	REQUEST	HOW FILLED
9/20	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
9/20	F. Loesch	Lucey/Crutcher	JC Records Keeping Copy Up	Found	
10/1	E. Hess	Hal Chase	TV Cost on World Peace	Found - Delivered	
10/2	D. Crutcher	Larry Speakes	JC Quotes - Anti Ag Services	Found - Delivered	

8304042001 93

8304042019 4

C70003

DATE	SENDER	W/B	ADDRESSEE	REQUEST	STATUS
9/1	E. Hess		Dave Robinson	JC Speech Communication Club	Received
9/1	E. Hess		Lucy Gritzmacher	JC Quote on Cut & Shab	Research
9/2	Shelby R.		Bill Cavin	FK Quote on Cartin	Found-D
9/2	E. Hess		Anne Aaretion	JC Flipflops on Computer	Found-D
9/3	S. R.		Tony Dolan	JC Quote on Firing Cab. Meals	Found-D
9/3	E. Hess		Anabee	JC Quotes in 1976	Delivered
9/4	E. Hess		Tony Dolan	Text of Civil Writs Proc Conf.	Found-D
9/3	E. Hess		Dave Geigen	JC Flipflops	Found-D

8304042001195

8304042001196

DATE	SENDER	RECEIVER	REQUEST	COMMENTS
9/1/80	Beringer	Ron Ballowin	Carter Republican Convention	Sent
9/1/80	Beringer	Mary Davidson	Check on Progress of Magazine Rep	
"	Beringer	Meg Shields	Incumbency Watch	Sent
9/2/80	Beringer	Mary Davidson	Magazine Update Response	Sent
9/3/80	Beringer	Tony Dolan	Sam Brown 77-83	
"	"	Tony Dolan	Memo about the calls	Ok
"	"	Dave Gergen	Debates	
9/4/80	Beringer	Frank Donatelli Advance Gas 3:38	Equal Rights Amd	Ok
"	Beringer	Tony Dolan	C. Viletti Quotes	Ok
"	"	"	Detroit Judges News	Ok
9/4/80		Frank Donatelli	Democratic Platform	Ok
9/5/80		Tony	I Wants a Copy of Newsweek	
9/5/80		Tony	I Wanted Civiletti Quote	Ok

DATE	SCRIBER	R/C'D	REQUESTER	REQUEST	FILLED
9-L	Rytec	Tony Bolen	[illegible] Carter [illegible]		

8304042019-7

2/25	Diesel	Jet Palace	Breath Freshener, Cigarettes, Candy, Magazines, Toiletry, Razor Devices and Gum
2/29	"	"	

8304042019 8

080003

DATE	SUBMITTED BY/TO	RECEIVED FROM	REQUEST	RETURNED
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
0	"	Jan Drescher (2)	Questions re Wife	To Board Room
[illegible]	[illegible]	Materials Assemble	Base Close Costs	[illegible]
[illegible]	—	—	[illegible]	[illegible]
0	"	Ann Fairbanks	Need Stats. on housing	Gave to her then
0	"	Jim Pinkerton	Carter used 2 statements on Sec. Sec. - what were they?	Put Package
[illegible]	[illegible]	[illegible]	NOTE: JIM COULD NOT BE More Specific	Together sent to all
0 9	"	Ann Fairbanks	More on housing	Put together — sent over
0	"	Jim Pinkerton	1. Brazil Interview in Time 2. Figures on S.S. TAX INCREASE 78-81	Put together and sent out
0	"	Jim Pinkerton	Question on Fed. register	Sent MEMO with INFORMATION
8 3 0 4 0 4 2 0				

		→	+ Econ w/ Rec	
11/		Econ Data		
		" "	for Ed Gray +	
		Tom Casey	M. Anderson	
9/3	Tom Casey	→	Econ Data	orally Tom C
9/4	↓	Tom Casey	Econ. Data	" "

8304042020 0

8304042201

DATE	NUMBER	NUMBER	TEST	INITIALS
2-15	11	For Project Series Dr Dagon	Forms + mailing addresses for Sentinel Employee Contacts	

80003

1/4				
45				

8304042020 2

DATE	CALLER	RE/BE	REQUESTER	REQUEST	
9/1	Thomas	Davis Robinson		Will newspapers be available	
9/1				Wanted Geo. Wills column - 6/15	Helen Ammon
9/2		Ed Gray		Needed data from NYT Bank. However, found answer before we could get	running (a
9/2		Joe Cooper	675-3630	Wanted Record outcomes on Vet. Hispanic + Jewish	
9/3		Kim Borchardt		Wanted photo of big tower	Chuckd - mtg at Marq 9/12 9/4 PD
9/3		Aranchia Anderson		Quotes - Kennedy on Carter (candidate)	sent over 7:30am
		" "		Quotes (old) by Mondale + Carter	
9/4		Tony Dolan	371	Where is ad? + how many things we have	Probably be ba
9/4		Robert Garrick		Wanted 2 transcripts for Ed Meese	- Sent 3 pm
9/5		Anastasia Anderson		Mondale Voting records + more quotes - Sent 3 pm	
9/5		Robert Garrick	3520	Wanted Vol. list of Promises as compared to last W/ count of	Sent - 3 pm
9/5		Buzzy Timmons		Wanted 75 of Issues	They will call Wanamaker on

Also received call from St. Anthony's Messenger (a ½ million circulation Catholic paper) asking for stds - call was returned by R/B Comm.

8304042023

80000

DATE	SHIFTER	BP/13 REGISTER	REQUEST	REMARKS
9/3	AA	Bill Bircoiss	Copies of Dem. Platform	per
9/4	AA	Air and Auto	Adv. Comm. Pamphlets	per
			re Constitution	
9/4	AA	Ryan Walker	defense info.	Telephone

8304042020 4

[illegible] CAMPAIGN (Campaign '80-[illegible]ailing) PHONE CALLS

C80003

8/11 Monday	Carol phoned requesting proper dimensions for ads. Info[illegible] given to her on various sizes acceptable to ethnic/religio[illegible]
8/14 Thursday	Phoned Joe Holmes to give info on Hispanic Press (McAllen, T[illegible] Naticnal newspaper published in Texas that wants to do featu[illegible] on Reagan/Bush Campaign.
8/14	Talked with Eleanor Callahan on general advertising effort. Referred me to Joe Holmes (see above) Requested information on demographics, etc. for key targeted states with respect to different ethnic groups.

8304042205

DATE	FROM	TO	SUBJECT	REQUEST
9/01	C Davis	Libby Dole	RR position: Hispanics	Forward to same as
9/01	C Davis	Jean Sargaust	Read, Proof, Clipping	Sr. Citizen brochure at
		Carol Mulgrave	Campaign '80 Advertising	copy
9/02-04	C Davis	Libby Dole	Assistance: RR clips	delivered
			RNC newsletters	Voter group
			RNC direct mail pieces	subject

8304042020206

130000

8304042020202

830040202008

DATE	STAFF MEMBER	REQUESTOR	REQUEST	FOR WHAT USED
9/9	Anne	Lucia Harris (Library)	Copy of article from WSJ re Dept. re AR welfare reform	Sent by msg
9/8	"	Beth Reeves (Grass Citizen)	Newspaper articles	Sent by msg
9/10	"	Lucy Fitzmacken (Library)	Foreign Affairs article	Did not have
9/10	"	"	WSJ article from '79	Referred to Ref
9/10	"	Misty for Doug Blandow	Anything in Pres. Doc. re Alaskan Land 1977-80	Sent them Table was also ask about this (not specifically Pres Doc.)
9/10	"	Martha Holdridge (Library)	Article from Amer Lawyer Mag. re Anderson	Did not have will send to Lib of Congress and send me a copy.
9/12	"	Lucy Fitzmacken Library	Info on first Spanish settlements in Fla & Texas	Have over phone

DATE ST. LIFER RP/3 REQUESTER REQUEST 120003 REN. REQ.

DATE	ST. LIFER RP/3	REQUESTER	REQUEST	REN. REQ.
7/16	KEEGAN	C KING	CONSIDERATION OF ADDITIONAL PRES. QUESTION WORDING	10 DAY

8304042020209

830404020210

DATE	SAMPLER	TESTER	REMARKS	ITEM NO.
4/23	Thomas	Robert Brown	Washed filter & spare filter for 24 hr.	3
	"	Cassandra Hayes	Washed 2nd Comp. Sets on downstream	
4/24	"	Brown (T. Delon)	Washed pre-cut labels for Pl. 2-4-5	

DATE	STAFFER	FR/GB	REQUESTER	REQUEST	DOCUMENT FILED
1/5	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
1/	Parsons	Kay Bell - GS	[illegible]	[illegible]	[illegible]

8304042021 1

830402-0041

DATE	STAFFER	REQUESTER	REQUEST	HOW HANDLED
9/12	Pinto	Martha Holdridge (Library)	Gift Articles	Sent by msg.
9/16		Martha Holdridge (Library)	Foreign Policy articles	Sent by msg.
9/16		Lucy Fitzpatrick (lib.)	Foreign Affairs article	Will send when
9/19		Lesley Song Debate Research	Info from Books-in-Print	Provided by pho
"		"	Feature Mag. writer info (one of debate questioners)	"
9/23		Martha Holdridge Library	Request that I order book for them from Nader group.	Will be sent b msg - when I r
			Ordered at our (Library) expense with understanding book be rel'd to me after election.	= =
9/25		Lesley Song Research	Ford's projected inflation rate for his Administration	Provided over p
9/25		Darrell Dini's Off.	Quote from Betty Ford book (re: In Search Of...)	Provided over p
9/26		Martha Holdridge Library	Latest Evans-Novak Report	Sent copy by

30063

TE	SEATTER 33/3	[illegible]	REQUEST	[illegible]
7/23	Clegg	Jim Pinkerton	info on patents issued	done
7/24	Clegg	Don Chow	info on conversion in Portland	done
9/25	Clegg	Jim Pinkerton	info on # of U.S. vessel hardwoods per country, hardness	done
9/8	Clegg	Mary (Klamath Duncan Ring)	Leaf response to anti-Reagan letter	done

8304042002213

DATE	SAMPLER	FILTER NUMBER	REMARKS
9/20	RAH	TSP WHATMAN	LIST OF CHANGES MADE IN SAMPLING METHOD OR ANY FACTORS THAT MAY HAVE AFFECTED THE CONCENTRATION RESULTS
9/24	RAH	DON CHAO	

8300420214

830420215

DATE	SENDER	R/B	ADDRESSEE	REQUEST	DISPOSED
4/20	Case	Moore	Last Transaction Visit	CR	
4/23	Case	Yuba Kalmar	Police Report of Incident	DYTTB	

FILE	STAFFER	PR/SB	REQUESTER	REQUEST	HOW HANDLED
112	[illegible]		Ray Bell	Pictures of Reagan Campaign [illegible]	Referred to [illegible]

8304042021 6

8304042017

DATE	STAFFER	RR/CB	REQUESTER	REQUEST	HOW HANDLED
9/16	E. Hess	Carol Nelson	Copy of Democratic platform on JC and Civil Rights	Faxed	
9/17	E. Hess	David Boggs	Copy of JC speech Gilbert	Faxed	
9/17	E. Hess	David Boggs	Copy of JC bio sheet	Faxed	
9/18	E. Hess	Mary Call	Date on RR Quote	Referred Call Ed Gray	
9/18	E. Hess	Bill Gavin	JC Quote on Malaise	Declined	
9/19	E. Hess	Ann Fairbanks	List of meetings of Women's Groups	Delivered by	
9/19	E. Hess	Tony Sidle/Tony Dolan	Comments by Jane Byrne & Editorial on Herald Bureau	→ Faxed - Not Faxed	
9/19	E. Hess	Tony Sidle/Tony Dolan	① Dolan OWP articles on Muskie ② articles on CBS expose critique of RR's economic plan	Faxed Not Faxed	
9/23	E. Hess	Martha Holbrook	JC and Abuse of Incumbency Issue	Faxed - Delivered	
9/24	E. Hess	David Boggs	JC quotes of military intervention	Faxed - Delivered	
9/12	D. Sidle	Darrell Bryant	JC statement on UFT re military [illegible]	Faxed -	

DATE	STAFFER	REQUESTER	REQUEST	HANDLED
1/24	Smith	Jim Gibson	Sterling for Gibson 65pd prepaid - (total = 38pd)	

8304021 8

C01003

DATE	STAFFER	FR/SB	REQUESTER	REQUEST	LOW NUMBER
9/16	Jane	Elaine		Tennessee and Florida primary results	CQ
9/17	Jane	Elaine		primary results	CQ
9/18	Jane	Peta		Electoral vote VT	Info. Pit
9/19	Jane	Maxine		Buckley vote w/ Gravel Civil Act of 1968	CQ-1968
9/19	Jane	Elaine		Colorado primary results	CQ

8304042021 9

830404200220

001003

DATE	SENDER	RP/CB RECEIVER	SUBJECT	ITEM
9/16	Kemp	Tom Gray	Sent letter for Ticket file	pkg
9/16	"	Copy from RP/CB Atlanta Office	Copy of Kemp's file from 1970	
9/18	"	Larry Liddle Kmis 2N	Typed 4 pp.	
9/16		Received letter from RP/CB for		

DATE	STAFFER	RP/SB REQUESTER	REQUEST	FOIA RECEIVED
9/15	Rick H.	Rick Waring	SUMMARY OF CARTER'S MEET FLAGGED FOREIGN PRESS	SENT COPY OF TH OF FIRST ITEM

8304042202 21

IE	SENDER	FB/FB	REQUESTER	REQUEST	HOW HANDLED
1	Ca. 55	Jan Pilcher			Status

DATE	SHIPPER	B/L	FORWARDER	ROUTE	DESTINATION
1/15	Sharon		Con Lisa	Con Lisa - 340 opp Lift	Chevy - Salt
2/15	"		McHaven	Lap 1st Rail Dep to Omaha Pk - Conf	
				60 cycle	

8304042022 3

E	MATTER	FB/CB	REQUESTER	REQUEST	HOW HANDLED
			Jim Phillips	SS. Files from RM-RMO	

DATE	SENDER	PHONE NUMBER	REQUEST	
9-15	Stewart	Tom Gray	Copy of Agreement Paper	D...
9-15	Stewart	Kim Tuesdale	OBA - Banking Laws	Ret...
9-15	Stewart	Mary Earl	Notes on Petr. Energy, Real-Comp-	See ... & Sh...
9-16	Stewart	Paul Mayberry	Xerox copy of "Oil & Gas, the Oper...	Retain
9-17	Stewart	Penny Eastman	Probate information for Nick client	Return
9-17	Stewart	Ben Echelman	Probate and Alaska Oil, SS matters.	Return
9-17	Stewart	Bill Dolan	Info on Probate & Dependent petroleum	estate,
9-17	Stewart	Kim Tuesdale	info. on inheritance taxes - OBA	return

8304042022 25

	SENDER	FR/GB	REQUESTER	REQUEST	HOW HANDLED
	Reagan	Pat Fairbanks	Hearing --	Hon. [illegible]	
	"	Ann Fairbanks	Hearing —	"	"
	"	Ann Fairbanks	Hearing —	"	"
	"	Ann Fairbanks	S.C. Sec —	"	"

8304042202226

DATE	SPEAKER	REQUESTER	REQUEST	REMARKS
10/6	Thursday	Annie Armitage	Wanted to see cartoon	Cartoon produced
		Tony Dolan	Ellis to question Brooks re US Philatelic Award	
		Ed Gray	Wanted Carter govmt grants	Referred to BB
10/15		Joe Cooper (Chicago)	"Who is kind of Amer. for Reagan"	(Hilma - 2nd Session)

8304042022227

REAGAN BUSH COMMITTEE PROJECT

211003

DATE	STAFFER	FR/CB	REQUESTER	REQUEST	HOW HANDLED
10/	Rosen	Peter Hauser	Info on WH Fellows awarded, membership, etc.	Phone	
10/15	"	Beth Barnes Swiss Cite.	Article from Int. Times re HHS employee detailed to WH.	Got by ph	
10/15	"	Mitaji ?	Same request ↑ ↓	Referred to Barnes for	
10/17	"	Lacy Library	Names of 2 Swiss diplomats who delivered ltrs from US to Iranian officials 3/30/80	Unable to g names - on titles/positio	
10/17		"	Name of French attorney, who hired by Iran, who prepared 450-pg document against Shah.	Provided by	

8304042021

REAGEN USSR CONFIDENTIAL BOX

C11003

DATE	STAFFER	SR/GB	REQUESTER	REQUEST	HOW HANDLED
4/24	CLEGG		Hon Berliner	Arrangements in Colorado	Done

DATE	STARTER	R/B	REGISTER	REQUEST	
10/15/80	Powell	Joe Cooper		10 1st Mondays of	Sent 10
		Lewis Burke		Census Count 1980	
10/16/80	Dean	Ft Dodge		1 box of 1st Mondays	Sent
		Reagan/Bush		200 1 box 1st Mondays	
	Dean	Minnesota		to Minnesota	
		Field Office		samples of last	Done
		Reagan-Bush		3 issues to send	
10/16/80	Powell	Reagan/Bush HQ		10 1st mondays to	Sent
10/17/80	"	R/B Rockford		100 Sept, Oct, 1st Monday	sent 50
10/18/80	"	R/B.		100 Oct 1st M	
10/18/80	"	R/B Shirley		What is "American Cancer?	Response
10/20/80	"	R/B Rockford		Cancer Census	Sent 2

8304042023O

DATE	STAFFER	BR/OB	REQUESTER	REQUEST	HOW HANDLED
9/5	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
9/5	"		Misty Quick	Market Budget w/p	Delivered
9/7	"		Robertson	Eco Data	Transmitted orally
"			"	"	"
"			"	"	"
9/8	"		"	CPI DATA	Messenger
"	"		"	Income Data	"
"	"		"	Store Prices	"
9/8	"		Rita	GNP estimate	Phone
9/8	"		Jerry Green	[illegible]	Daily Treasury
9/8			Robertson	TPI	Phone
10/7			McHenry (H.O.)	TPI Data	Direct Hit, Phone
10/7			Eliz Dole	Econ Info	Phone
10/9			Treasury/Ec Staff	Revenue Sharing	Memo to Secretary

ESTABLISH A SUITE FOR

DATE	STAFFER	BR/CB	REQUESTER	REQUEST	HOW HANDLED
	BB		TISDALE	Hamburger Thanksgiving	Ph. I
	BB		BERLINER	CALENDAR	
	BB		"	CARTER Speech	
	"		"	CARTER Kennedy U. QUOTES	Ph. 2
	"		ALEXANDER	FANNIE MAE Comp.	Lyle
	"		WALLACE	LAST SIT and SIT tel Hotline out new	
	"			Anna - 685-3420	
	"		Tatum	Need to delete Andrus	Beer
	"		CHURCH	Need to [illegible]	"

8304042023 2

DATE	STAFFER	PR/CB	REQUESTER	REQUEST	NOW RESOLVED
9/20	Clegg	PMT UNCLAS TWX VARIEY		Statement on Turkey	None
10/3	Clegg	"		" " communications	"

8304042002333

DATE	SCATTER	PR/CB	REQUESTER	RLQUEST	HOW HANDLED
10/6	Fortier	Rita Solon (Policy Development) (for speechwriter		Background info on Eliot Smith Memorial Foundation Dinner (annual) Reagan is addressing this month.	Provided info from 1980 [illegible] some data [illegible] speech.
10/9	"	Holdridge (Library)		Wanted NAPCP position paper on energy released several years ago (showing correlation between energy shortage/black unemployment)	Called back to report calling NAPCP who will furnish; will [illegible] me copy also.
10/10		Lucy (Library)		Details of Pueblo seizure, release	Provided over p

8304202036

CAMPAIGN 80

135 WEST 50TH STREET, NEW YORK, NY 10020, TELEPHONE (212) 664-0700
901 SOUTH HIGHLAND STREET, ARLINGTON, VA 22204, TELEPHONE (703) 685-3400

TO: Andy Carter
Commitment '80

FROM: George S. Karalekas

DATE: September 11, 1980

SUBJECT: 9/13 Commitment '80 Telecast: Supplemental 30 Min. Purchases/ Final Up-Date on Station Clearances

RUSH-BY TELECOPIER

8304042035

To confirm our conversation of today, below is a list of the local 30 minute time periods purchased in selected markets with your authorization in order to compensate for the non-clearance of the network program by the local CBS affiliate:

STATION	MARKET	DATE/DAY TIME PERIOD	NET COST 30 MINS. ($)	MATERIAL REQUIREMENTS
WJBK*	Detroit	9/13 Sat. 4-4:30 PM	1,360.00	2" Tape
KTSB	Topeka	9/13 Sat. 12:30-1 PM	178.50	2" Tape
KFWR**	Bismarck	9/13 Sat. 12 Noon-12:30 PM	403.75	2" Tape
KMOT	Minot			
KUMV	Williston	Satelite Stations Fed By		
KQCD	Dickinson	Bismarck	"No Charge"	None
WTOV***	Wheeling/ Steub.	9/14 Sun. 1-1:30 PM	382.50	2" Tape
WBOC****	Salisbury	9/13 Sat. 4-4:30 PM (approx)	191.25	2" Tape
		TOTAL TIME COST	2,516.00	

* CBS Affiliate
** NBC/ABC Affiliate
*** NBC Affiliate
**** CBS/NBC Affiliate

For your further up to the minute information, I have also enclosed the final CBS station line-up on the telecast for the network feed.

.....

"MISCELLANEOUS INFORMATION UPDATE"

(1) In order to avoid ruining the impact of the video with the indiscriminate placement of local telephone "supers", CBS (at my request and with your approval) has instructed their stations, that they can only air one local "super" as authorized and paid for by the local Commitment '80 representative in their market.
CBS further advised their stations that the local "supers" are to be inserted in the lower third of the screen at 27 minutes:15 seconds into the program and off by 27 minutes:50 seconds...a total of 35 seconds of video exposure.

(2) As you will recall, the network time-cost for the 30 minute broadcast was $60,625.00. Coupled with the aforementioned local purchases, our total out-of-pocket time cost is $63,141.00. This, as you know,excludes the cost for producing the program and the tape, dupe materials/shipping charges, as well as the "same day" satellite hook-up charges for feeding Hawaii. The final costs for these elements will not be available until after the broadcast. The only item we do have an approximate figure on is the satellite feed....estimated cost $700.

SUMMARY

Andy, I hope this final update is helpful. We have enjoyed working with you and Nancy on the project. Our thanks to you both as well as to your field support staff for your assistance.

In closing, you would appreciate CBS's Director of Clearances comments to me on the finalization of these clearances.."Even the Super Bowl was not able to secure the station line-up that Commitment '80 September 13th telecast was able to secure"!!

GSK:af

cc: B. Casey, B. Timmons, D. Lewis, E. DeBolt - RBC
N. Christy - Commitment '80
P. Dailey
D. O'Reilly
M. Tubridy
R. Berry
J. Roth
S. Cohen
J. Pasquale
M. Heinrich
E. Callahan

8304042036

Copy

TERMINAL C68A 11:01:19 A.M. SEP 12, 1980 REQUEST 4 SYSTEM 5398

PAID POLITICAL 1:30 - 2:00 P.M. SAT -09/13/80 AS OF 09/12/80

CLEARED LIVE

**** EASTERN	WAST ALBANY N	WBKB ALPENA	WTAJ ALTOONAPA	WAGA ATLANTA			
WRDW AUGUSTAGA	WABI BANGOR ME	WENG BINGHAMTN	WNAC BOSTON	WIVB BUFFALO			
WCAX BURLINGTN	WWTV CADILLAC	WCSC CHALSTNSC	WCHS CHALSTNWV	WBTV CHARLOTTE			
WDEF CHATTNOGA	WCPO CINCINATI	WJKW CLEVELAND	WRBL COLUMBSGA	WHIO DAYTON OH			
WTVD DURHAM NC	WSEE ERIE PA	WBTW FLRENCESC	WINK FT MYERS	WTVX FT PIERCE			
WFMY GREENBORO	WNCT GREENVILL	WHP HARRISBRG	WFSB HARTFORD	WJHL JOHNSNCTY			
WKZO KALAMAZOO	WBIR KNOXVILLE	WJIM LANSING	WLYH LEBANON	WKYT LEXINGTON			
WHAS LOUISVILE	WMAZ MACON GA	WLUC MARQUETTE	WTVJ MIAMI FLA	WCBS NEW YORK			
WTAR NORFOLKVA	WDBO ORLANDO	WCAU PHILADELA	KDKA PITTSBURG	WGAN PORTLNDME			
WAGM PRES ISLE	WTEV PROVIDENC	WTVR RICHMOND	WDBJ ROANOKE	WHEC ROCHESTER			
WEYI SAGINAW	WTOC SAVANNAH	WDAU SCRANTON	WTVH SYRACUSE	WCTV TALAHASEE			
WTVT TAMPA FLA	WTOL TOLEDO OH	WDVM WASHINGTN	WNNY WATERTOWN	WDTV WESTON			
WKBN YOUNGSTWN							
**** CENTRAL	KTAB ABILENE	KFDA AMARILLO	WHMA ANNISTON	KXII ARDMORE			
KTBC AUSTIN	WAFB BATON RGE	KFDM BEAUMONT	WBMG BIRMNHAM	KZTV C CHRISTI			
WMT CEDAR RPD	WCIA CHAMPAIGN	WBBM CHICAGO	WCBI COLUM MIS	KFVS CP GIRAUD			
KDFW DALLAS	KCCI DES MOINS	WTVY DOTHAN	KDLH DULUTH	KTVC ENSIGN			
WEHT EVANSVILL	KXJB FARGO	WANE FT WAYNE	KLMN FT. SMITH	KGBT HARLINGEN			
KHOU HOUSTON	WHNT HUNTSVILL	WISH INDIANPLS	WJTV JACKSONMS	KRCG JEFF CITY			
KTVJ JOPLIN	KCMO KANSAS CY	WKBT LA CROSSE	KLFY LAFAY LA	WLFI LAFAYTIND			
KVTV LAREDO	KOLN LINCOLN	KTHV LT ROCK	KLBK LUBBOCK	WISC MADISON			
KEYC MANKATO	KIMT MASON CY	WREG MEMPHIS	WHTV MERIDIAN	WITI MILWAUKEE			
WKRG MOBILE	KNOE MONROE	WTVF NASHVILLE	WWL NEWORLEAN	KOSA ODESSA			
KWTV OKLA CITY	WOWT OMAHA NEB	WMBD PEORIA	KHOA QUINCY	WHBF ROCK ISLE			
WIFR ROCKFORD	KCTV SAN ANGLO	KENS SAN ANTON	WSLA SELMA ALA	KSLA SHREVPORT			
KMEG SIOUX CTY	KELO SIOUX FLS	WSBT SO BEND	KOLR SPRINGFLD	KMOX ST LOUIS			
WTHI TERRE HAU	KOTV TULSA	WCFT TUSCLOOSA	WSAU WAUSAU	KTVH WICHITA			
KAUZ WICHTA FL							
**** MOUNTAIN	KGGM ALBERQUE	KTVQ BILLINGS	KBCI BOISE	KXLF BUTTE			
KYCU CHEYENNE	KKTV COLO SPGS	KMGH DENVER	KDBC EL PASO	KXGN GLENDIVE			
KREX GR JUNCT	KRTV GREAT FLS	KBIN ROSWELL	KSL SALT LAKE	KMVT TWIN FLS			
**** PACIFIC	KPNR BAKERSFLD	KVOS BELLNGHAM	KHSL CHICO	KECC EL CENTRO			
KIEM EUREKA	KFSN FRESNO	KLAS LAS VEGAS	KLEW LEWISTON	KNXT LOS ANGLS			
KMST MONTEREY	KEPR PASCO	KOIN PORTLD OR	KTVN RENO	KXTV SACRAMTO			
KFMB SAN DIEGO	KPIX SAN FRISO	KIRO SEATTLE	KREM SPOKANE W	KCOY ST MARIA			
KIMA YAKIMA							

TOTAL: 164

DELAYED

WBFF	BALTIMORE	SAT.	0330PM	00	DD	L	WLTX	COLUMBIA	SAT.	0400PM	00 DD L
WBNS	COLUMBSOH	SAT.	0300PM	00	DD	L	WJXT	JACKSONVL	SAT.	0400PM	00 DD L
WSPA	SPARTANBG	SAT.	0200PM	00	DD	L	WBAY	GREEN BAY	SUN.	1130AM	01 DD L
WCCO	MINNAPOLS	SAT.	0230PM	00	DD	L	WCOV	MONTGOMRY	SAT.	0230PM	00 DD L
KCWY	CASPER WY	SAT.	0200PM	00	DD	L	KID	IDAHO FLS	SAT.	0130PM	00 DD L
KOOL	PHENIX	SAT.	1030AM	00	DD	L	KOLD	TUCSON	SAT.	1030AM	00 DD L
KTVL	MEDFORD	SAT.	0200PM	00	DD	L	KTVA	ANCHORAGE	SAT.	1230PM	14 DD L
KTVF	FAIRBANKS	SAT.	0130PM	21	DD	L	KGMB	HONOLULU	SAT.	0200PM	00 DD L
KIFW	SITKA	SAT.	0200PM	14	DD	L	KGMV	WAILUKU	SAT.	0200PM	00 DD L

TOTAL: 18

UNAVAILABLE

**** EASTERN	WJBK DETROIT (A)	WBOC SALISBURY (A)	WTRF WHEELING (A)	WSBA YORK	
**** CENTRAL	KXMB BISMARCK (A)	KBTX BRYAN	KAYS HAYS KAN	KCNC MINOT (A)	
WIBW TOPEKA (A)	KWTX WACO TEX	KCMD WILLISTON (A)			
**** MOUNTAIN	KDIX DICKINSON (A)	KLOE GOODLAND	KWRB RIVERTON		
**** ~~FOREIGN~~	~~KUAM AGANA~~	~~WEND ST THOMAS~~			

TOTAL: 8 ~~10~~

UNAVAILABLE ON ALT.

WBAF BALTIMOREW UOO/ON ALT STN WBFF BALTIMORE

AWAITING CLEARANCE: 0

TOTAL 190 0

END OF TRANSACTION

(A) Cleared on Spot basis (see 9/11/80 Recap memo)

(*) Changed from live clearance to 2:30-3 PM

RECEIVED

SEP 12 1980

2 PM

Total # Cleared Stations: 190

GEORGE S. KARALEKAS

8304042037

The following expenditures have been made on behalf of the Reagan/Bush Committee to be attributable to the $4,873,653.76 limit:

09/08/80	RNC- In House Computer Ser.	Computer Ser.	$ 3,314.83
09/07/80	RNC- In House Printing Ser.	Printing Costs	307.49
09/04/80	United Airlines	Trans.	60,956.74
09/11/80	United Airlines	Trans.	207,229.35
09/17/80	United Airlines	Trans.	204,287.00
09/24/80	United Airlines	Trans.	238,388.34
09/04/80	Decision Making Information	Service-Polling	380,000.00
09/15/80	New York Times	Ads	18,340.00
09/10/80	RNC- In House Computer	Short Mailings	1,000.00
10/01/80	The William Carruthers	Services- Media	25,000.00
10/01/80	D'Arcy MacManus and Masius	Services- Advertising	37,500.00
10/01/80	RNC- In House Printing Ser.	Printing Costs	1,000.32
10/01/80	United Airlines	Trans.	316,520.00
10/06/80	Alpha Aviation	Trans.	10,000.00
10/07/80	Postmaster	Postage	87,500.00
10/07/80	Postmaster	Postage	36,750.00
10/07/80	Postmaster	Postage	35,000.00
10/07/80	Integrated Communication	Mailing Ser.	17,400.00
10/08/80	United Airlines	Trans.	279,431.29
10/08/80	Ed Yardang Assoc	Media Buy	43,370.15
10/08/80	SFM Media	Media Buy	175,000.00
10/09/80	Integrated Communication	Mailing Ser.	17,400.00
10/09/80	Ed Yardang and Assoc	Media Buy	9,508.95
10/09/80	Consumer Merchadising	Mailing Ser.	15,375.00
10/09/80	Postmaster	Postage	3,500.00
10/09/80	Consumer Merchandising	Postage	21,000.00
10/10/80	D'Arcy MacManus and Masius	Advertising	37,500.00
10/16/80	United Airlines	Trans.	289,591.97
10/23/80	New York Times	Refund	(1,411.17)
10/21/80	MacMannes Inc	Buttons	263.73
10/20/80	Newspaper Advertising	Advertising	500,000.00
10/30/80	Satellite Media	Media (Alloclable part)	18,000.00
10/22/80	DCM Group	Direct Mail	526,225.00
10/23/80	MacMannes Inc	Buttons	258.73
10/23/80	Newspaper Advertising	Advertising	400,000.00
10/23/80	Consumer Merchandising	Direct Mail	15,375.00
09/19/80	Sandy Alecander	Supplies	367.52
09/19/80	Columbia Advertising	Buttons	337.50
09/24/80	Federal Express	Shipping	18.33
10/29/80	Columbia Advertising	Buttons	2,750.00
10/27/80	Newspaper Advertising	Advertising	100,000.00
10/28/80	RNC- In House Printing Ser.	Postage	6,836.55
10/29/80	DCM Group	Direct Mail	24,211.00
10/29/80	RNC- In House Printing Ser.	Postage	598.05
11/04/80	DCM Group	Refund	(249.09)
11/04/80	Youth for Reagan Program- Allocable Costs		53,117.01
10/1/80	II Republican	Ads	360.00 **
12/24/80	Artisan Printing	Printing	617.98 *
12/31/80	Campaign 80 - Allocable Costs		27,000.00
12/31/80	RNC- In House Computer	Computer Costs	599.50
		Total Year to Date	$4,479,239.27

** Reported in prior period
* Referenced to Line 19

830420238

Republican National Committee

Membership Office
Finance Division

File Proces

September 9, 1980

MEMORANDUM

TO: Arlene Triplett

FROM: Leah Charnock LC

RE: Letter for Reagan Checks

Arlene, attached is the proposed copy for the follow-up letter to those contributors whose checks are handled here at the RNC, and fall into "category two" of Don Ivers memo about checks relating to the Presidential campaign.

Please let me know your comments. We are anxious to resolve the handling of these checks.

Thank you.

/amn

cc: Phil Smith ✓
Ann Nimmer

8304042023 9

C01003

Dear ----------,

This letter comes in response to your generous contribution of $xxxxx, which we received at the Republican National Committee.

We would like to make you aware of the fact that although your check was made payable to Ronald Reagan and/or his Presidential Campaign Fund, it was deposited into the account of the Republican National Committee. The reason for this is twofold: first, the Reagan/Bush Committee, by law can no longer accept individual contributions for use in the Presidential campaign effort, and, second, your donation came in response to one of our Committee fund-raising appeals.

Because of the proliferation of federal regulations regarding the expenditures of the Presidential campaign, it is necessary for me to inform you that this money will be used by the Republican National Committee to support its total campaign program. This includes efforts to elect Republicans at all levels: local, state, Congressional, Senatorial and Presidential.

If we have misinterpreted your intentions, please feel free to contact our membership office at the address below. In this crucial election year we are grateful for your continued interest in the Republican Party. Only with your support can we reach our goals for electing a Republican President and many more officeholders across the country.

Very truly yours,

BILL BROCK
Chairman

BB/amn

8304042024O

CAMPAIGN 80

135 WEST 50TH STREET, NEW YORK, NY 10020. TELEPHONE (212) 664-0920
901 SOUTH HIGHLAND STREET, ARLINGTON, VA 22204. TELEPHONE (703) 685-3400

September 5, 1980

Mr. Andy Carter
Commitment '80
Republican National Committee
310 First Street, S. E.
Washington, D. C. 20003

re: CBS-TV Station Clearance Report
For 9/13/80 Commitment '80
Telecast (1:30-2PM EDST)

8304042024 1

Dear Andy:

Attached for your reference and use is CBS's latest Station Clearance Report (as of 3 PM today) for the above telecast. This was the basis for the information I verbally telephoned into you and Nancy today.

As agreed, in order to assure 100% clearance to the degree possible, the following strategy will go into effect immediately:

(1) We will allow CBS and their affiliates the latitude of airing it any time between 11:30AM and 4PM on the telecast date.

(2) We will use a three-pronged pressure tactic to secure clearances on the "unavailable stations":

a) You will have your local people contact these hold-out stations directly.

b) I will have our buying staff here in New York contact these stations' senior management locally.

c) I will continue to work with the CBS Network management here in New York to have them maintain the pressure on the local stations from the "corporate" end.

d) As for Alaska and Hawaii...we will continue to finalize setting up the satellite feed (estimated cost $3,000).

Please advise if you have any further questions. I'll call you late Monday with an update.

Best regards.

Cordially,

George

George S. Karalekas
Senior Vice President
Executive Director Media

GSK:mg

cc: RBC

W. Casey
D. Lewis

RNC

N. Christy

Campaign 80

R. Berry
E. Callahan
B. Carruthers
S. Cohen
P. Dailey
M. Heinrich
M. Moore
R. O'Reilly
J. Roth
M. Tubridy

8304042024 2

TERMINAL B69A 3:17:38 P.M. SEP 5,1980 REQUEST 410 SYSTEM 17410

PAID POLITICAL 1:30 - 2:00 P.M. SAT -09/13/80 AS OF 09/05/80

CLEARED LIVE

**** EASTERN	WBKB ALPENA	WTAJ ALTOONAPA	WAGA ATLANTAGA	WBOW BOWLING GR			
WBNG BINGHAMTN	WIVB BUFFALONY	WCAX BURLINGTN	WWTV CADILLAC	WOSC COLUMBUS			
WCHS CHALSTNWV	WBTV CHARLOTTE	WCPO CINCINATI	WJKW CLEVELAND	WPBL COLUMBSGA			
WHIO DAYTON OH	WTVD DURHAM NC	WSEE ERIE PA	WINK FT MYERS	WTVX FT PIERCE			
WHP HARRISBRG	WKZO KALAMAZOO	WBIR KNOXVILLE	WJIM LANSING	WLYH LEBANON			
WKYT LEXINGTON	WHAS LOUISVILE	WLUC MARQUETTE	WTVJ MIAMI FLA	WCBS NEW YORK			
WTAR NORFOLKVA	WCAU PHILADELA	WGAN PORTLNDME	WAGM PRES ISLE	WTVR RICHMOND			
WDBJ ROANOKE	WHEC ROCHESTER	WEYI SAGINAW	WTOC SAVANNAH	WDAU SCRANTON			
WTVH SYRACUSE	WCTV TALAHASEE	WTVT TAMPA FLA	WTOL TOLEDO OH	WDVM WASHINGTN			
WNNY WATERTOWN	WDTV WESTON	WKBN YOUNGSTWN					
**** CENTRAL	KTAB ABILENE	KFDA AMARILLO	WHMA ANNISTON	KXII ARDMORE			
KTBC AUSTIN	WAFB BATON ROE	KFDM BEAUMONT	WBMG BIRMNHAM	KXMB BISMARCK			
KZTV C CHRISTI	WMT CEDAR RPD	WCIA CHAMPAIGN	WBBM CHICAGO	WCBI COLUM MIS			
KFVS CP GIRAUD	KDFW DALLAS	KCCI DES MOINS	WTVY DOTHAN	KDLH DULUTH			
WEHT EVANSVILL	KXJB FARGO	WANE FT WAYNE	KLMN FT. SMITH	KGBT HARLINGEN			
KHOU HOUSTON	WHNT HUNTSVILL	WISH INDIANPLS	WJTV JACKSONMS	KPCB JEFF CITY			
KTVJ JOPLIN	WKBT LA CROSSE	KLFY LAFAY LA	WLFI LAFAYTIND	KVTV LAREDO			
KOLN LINCOLN	KTHV LT ROCK	KLBK LUBBOCK	KEYC MANKATO	KIMT MASON CY			
WREG MEMPHIS	WHTV MERIDIAN	WITI MILWAUKEE	KXMC MINOT	WKRG MOBILE			
KNOE MONROE	WTVF NASHVILLE	WWL NEWORLEAN	KOSA ODESSA	KWTV OKLA CITY			
WOWT OMAHA NEB	WMBD PEORIA	KHQA QUINCY	WHBF ROCK ISLE	WIFR ROCKFORD			
KCTV SAN ANGLO	KENS SAN ANTON	WSLA SELMA ALA	KSLA SHREVPORT	KMEG SIOUX CTY			
KELO SIOUX FLS	WSBT SO BEND	KOLR SPRINGFLD	KMOX ST LOUIS	WTHI TERRE HAU			
KOTV TULSA	WCFT TUSCLOOSA	WSAU WAUSAU	KTVH WICHITA	KAUZ WICHTA FL			
KXMD WILLISTON							
**** MOUNTAIN	KOGM ALBERQUE	KTVQ BILLINGS	KBCI BOISE	KKTV COLO SPGS			
KMGH DENVER	KDIX DICKINSON	KDBC EL PASO	KREX GR JUNCT	KRTV GREAT FLS			
KBIM ROSWELL	KSL SALT LAKE	KMVT TWIN FLS					
**** PACIFIC	KPWR BAKERSFLD	KVOS BELLNGHAM	KHSL CHICO	KECC EL CENTRO			
KIEM EUREKA	KFSN FRESNO	KLAS LAS VEGAS	KLEW LEWISTON	KMST MONTEREY			
KEPR PASCO	KOIN PORTLD OR	KTVN RENO	KXTV SACRAMTO	KFMB SAN DIEGO			
KPIX SAN FRISO	KIRO SEATTLE	KCOY ST MARIA	KIMA YAKIMA				

TOTAL: 147

DELAYED

WLTX	COLUMBIA	SAT.	0400PM	00 DD L	WBNS	COLUMBSOH	SAT.	0300PM	00 DD L		
WJXT	JACKSONVL	SAT.	0400PM	00 DD L	WSPA	SPARTANBG	SAT.	0200PM	00 DD L		
WCCO	MINNAPOLS	SAT.	0220PM	00 DD L	KCNV	CASPER WY	SAT.	0300PM	00 DD L		
KID	IDAHO FLS	SAT.	0130PM	00 DD L	KOOL	PHENIX	SAT.	1030AM	00 DD L		
KOLD	TUCSON	SAT.	1020AM	00 DD L	KREM	SPOKANE W	SUN.	0730AM	01 DD L		
KTVA	ANCHORAGE	SAT.	1200PM	14 DD L	KGMB	HONOLULU	SAT.	0100PM	07 DD L		
KGMV	WAILUKU	SAT.	0100PM	07 DD L							

TOTAL: 13

UNAVAILABLE

**** EASTERN	WMAR BALTIMORE	WDEF CHATTNOGA	WJBK DETROIT	WBTN FLRENCESC			
WFMY GREENBORO	WNCT GREENVILL	WFSB HARTFORD	WMAZ MACON GA	WDBO ORLANDO			
WTEV PROVIDENC	WSBA YORK						
**** CENTRAL	KBTX BRYAN	WBAY GREEN BAY	KAYS HAYS KAN	KCMO KANSAS CY			
WISC MADISON	WIBW TOPEKA	KNTX WACO TEX					
**** MOUNTAIN	KYCU CHEYENNE	KLOE GOODLAND	KHRB RIVERTON				
**** FOREIGN	KUAM AGANA	KTVF FAIRBANKS	WBNB ST THOMAS				

TOTAL: 24

UNAVAILABLE ON ALT.

AWAITING CLEARANCE

**** EASTERN	WAST ALBANY N	WABI BANGOR ME	WNAC BOSTON	WJHL JOHNSNCTY			
KDKA PITTSBURG	WBOC SALISBURY	WTRF WHEELING					
**** CENTRAL	KTVC ENSIGN	WCOV MONTGOMRY					
**** MOUNTAIN	KXLF BUTTE	KXGN GLENDIVE					
**** PACIFIC	KNXT LOS ANGLS						
**** FOREIGN	KIFW SITKA						

TOTAL: 17

END OF TRANSACTION

8304042024

August 30, 1980

To: Brock, Casey, Dailey, Deaver, DeBolt, ~~Lewis~~

From: Bill Carruthers

Re: Commitment '80, September 13 Telecast

A meeting was held this morning to plan the Commitment '80 program scheduled for airing on CBS on September 13. In attendance were: Hugh Branson, Bill Carruthers, Mark Goode, Noel Koch , Kate Moore, and Karyn Wellons.

Those who had been attempting to schedule the suggested participants reported already insurmountable difficulties in bringing them together at the only time facilities are available for taping the program in the form currently proposed. Further, the group collectively expressed concern for the impact of this program, if the studio format is adhered to. In view of these problems, this group unanimously recommends the following alternate format:

1. Pre-taped opening montage with music. 30 sec
2. Bill Brock opening remarks and intro Sen. Laxalt. (to be taped in front of RNC building.) 2.0 min
3. Laxalt talks with enlisted men near a military installation in Nevada--comments on lack of confidence and need for change to restore belief in the nation. 2 min.
4. Brock introduces Senator Heinz. ~~15 sec~~ 30 sec
5. Heinz discusses economy and talks with steelworkers who have been laid off, despite many years of seniority (to be taped outside a steel mill in Pittsburgh.) 2 min.
6. Brock introduces Congressman Van Der Jagt. 30 sec.
7. Van Der Jagt, speaking from steps of the capitol, talks about control of Congress by one party for 25 years. 2 min.
8. Brock introduces Sen. Kassebaum. ~~8~~ 30 sec
9. Kassebaum talks with women regarding effects of inflation on average family (to be taped in a home, possibly in Kansas.) 3 min

8304042024

10. Brock wrap-up and intro Governor Reagan. 1min.

11. Governor Reagan, speaking from Wexford, does strong volunteer pitch. 15min.

12. Pre-taped closing montage with music. 30sec.

At the end of each segment, the elected official involved will summarize and do a pitch for volunteers to help bring an end to the problem discussed.

The strong feeling of the group is that with a variety of locations and topics, the effect of the program will be greatly enhanced. The flexibility in shooting schedules it provides will be a welcome bonus to those who must handle production details.

cc. Branson
Carruthers
Goode
Koch
Moore
Wellons
Darley
Hendricks

8304042024

the DCM GROUP

A unit of ESDAND COMPANY, INC.

August 29, 1980

MEMO TO: Peter Dailey

FROM: Ed DeBolt

Attached is a suggested outline for the September 6th program as well as talking points for the September 13 broadcast.

I've also included for Bill Carruthers a dozen or so pages of talking points about COMMITMENT '80 for Noel Cook.

CC: Mr. Bill Casey
Mr. Drew Lewis
Dr. Richard Wirthlin
Mr. Hugh Branson
Mr. Dennis Whitfield
Mr. Bill Carruthers
Mr. Ed Meese

8304042046

the DCM GROUP

A unit of ESD AND COMPANY, INC.

August 29, 1980

MEMO TO: Peter Dailey

FROM: Ed DeBolt

RE: Draft Talking Points for September 13 National Broadcast

8304042047

Brock

- Acknowledgement of thousands of home parties/meetings throughout the country.
- Brief overview of COMMITMENT '80, its objectives, importance of October 4.
- Voter identification and turnout are traditional functions of RNC.
- Importance of walking and demonstrating personal commitment of thousands of Americans.

Armstrong

- Importance of reaching out to people in this campaign. The American people have always responded to challenges.
- The GOP is the party of new ideas for the future. For young people looking to change things, GOP is the way. Democrats are the party of the past, failed big government policies, etc.

Heinz

- Tremendous opportunity to capture control of Senate and give Governor Reagan's programs the support they deserve.

1515 North Court House Road, Suite 301, Arlington, Virginia 22201 / 703-524-7477

Heinz (cont.)

- Recent close/important votes on which a few more GOP Senators could have made a difference.
- Importance of team effort between national GOP, Reagan-Bush statewide and local campaigns.
- Fact that GOP Senate candidates have been extremely successful in recruiting volunteer workers and encouraging them to sign-up for COMMITMENT '80.

Vander Jagt

- Importance of using results of canvass for turnout and getting the vote out on November 4.
- Fact that surveys continue to show growth in voter identification with the Republican Party and GOP issues.

Governor Reagan

- Importance of volunteerism.
- Importance of party unity and cooperation at all levels.
- Importance of COMMITMENT '80 as a way for individual Americans to demonstrate their commitment to building a better government/ nation/future, etc.

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830000

Governor Reagan (cont.)

- Importance of electing GOP majorities in the House, Senate, governorships and state legislatures.
- Importance of election to future of the nation, restoring leadership and common sense, new, constructive programs to get the country moving forward again.

CC: Mr. Bill Casey
Mr. Drew Lewis
Dr. Richard Wirthlin
Mr. Hugh Branson
Mr. Dennis Whitfield
Mr. Bill Carruthers
Mr. Ed Meese

8304042049

the DCM GROUP

A unit of ESD AND COMPANY, INC.

August 26, 1980

MEMORANDUM TO: Stan Anderson

FROM: Ed DeBolt

RE: COMMITMENT '80 Mailing

The following is a status report on the COMMITMENT '80 mailing:

STATE	QUANTITY	AMOUNT DROPPED	BALANCE DROPPED/ DATE	IN-HOME DATES
Florida	426,000	--	426,000 8/28	Approximate 9/4 or 9/5
Ohio	400,000	270,000	130,000 9/5	First wave - 8/30-9/2 Balance - 9/8-9/10
Illinois	900,000	500,000	400,000 8/29	200,000 - in-home Balance - 8/26-9/5
Oregon	136,000	136,000	--	8/29-9/2
Pennslyvania	400,000	157,000	243,000 9/5	First wave - 8/30-9/2 Balance - 9/8-9/10
Washington	141,500	141,500	--	8/29-9/2

Stan, targets within these states were Republicans, higher income, homeowners, and better education. A sample will be forwarded to you tomorrow.

The original letter copy which was used as a model, with obvious changes by state, is attached.

cc: Dennis Whitfield

1515 North Court House Road, Suite 301, Arlington, Virginia 22201 / 703-524-7477

8304042023 1

the DCM GROUP

POSTAGE

1,177,500 pieces @ 3.5¢ each

$41,212.50 - Delivered Wright Dayton

Check made out to: U.S. Postal Service, Nevada, Iowa

800,000 pieces @ 3.5¢ each

$28,000.00 - Angelina Ohio

Check made out to: U.S. Postal Service, Washington, DC

the DCM GROUP

POSTAGE

1,177,500 pieces @ 3.5¢ each

$41,212.50 - Delivers Weight Oregon

Check made out to:
U.S. Postal Service, Nevada, Iowa

800,000 pieces @ 3.5¢ each

$28,000.00 - Arrives Ohio

Check made out to:
U.S. Postal Service, Washington, DC

8304042023 2

the DCM GROUP

A unit of ESD AND COMPANY, INC.

August 7, 1980

MEMORANDUM TO: Dennis Whitfield

FROM: Ed DeBolt

We're going to apply 3.5¢ stamps to the mailings. Attached are the checks I'll need by tomorrow night, if possible. I'll let you know about the quantity and amount for Florida when I can.

Timmons and Stu Spencer were really pissed that the ten million had gone down to 2.5 million. Any hope of getting another $300-400,000 for another two million?

Timmons and Stu were also adament about having more fieldmen. I told Andy to work with you and Drew in trying to find $60-70,000 somewhere. Bill Timmons wants it back to the original field level.

You should call Eleanor in Peter Dailey's shop to check on the national broadcast. Again, Timmons is really high on going ahead -- maybe on the 18th of September.

Wisconsin
Michigan
Connecticut
Alaska + Hawaii others } another two million pieces —

8304042023

MEMORANDUM

republican national committee

TO: DENNIS WHITFIELD

FROM: PHIL SMITH

DATE: SEPTEMBER 15, 1980

RE: COMMITMENT '80 RESULTS THROUGH SEPT. 12, 1980

Total Mail Received	=	4,618
Total Contributions	=	1,269
Amount Received	=	$28,005
Average Gift	=	$22.07
Total Letters mailed	=	2,403,000
% Response	=	.005
Avg. Return per letter mailed	=	.01
Total mail received on 9/15	=	1,962
Est. pieces w/money	=	412
Est. amount received	=	$9,064

Dennis, given the above results I am highly skeptical of thequantities mailed and mailing date information. For example, our first returns from Ohio arrived only today. In contrast, we have been receiving mail from Florida for the last 10 days. In Florida alone you are getting .04 per letter mailed -- not bad for a mail date of 8/28.

I think you should ask for "proof of mailing" receipts from the mailing house in order to verify the drop counts and mail dates.

Please give me a call if you would like to discuss this matter in further detail.

cc: Jack Faris
Leah Charnock

/bjj

8304042025

MEMORANDUM

republican national committee

TO: DENNIS WHITFIELD

FROM: PHIL SMITH

DATE: AUGUST 12, 1980

RE: VOLUNTEER MAILING/PROCESSING

Per our discussion last week, the Direct Mail Department will be able to process your returns from the 2.5MM volunteer mailing.

Returns will be separated into two groups -- contributors and non-contributors. Contributor returns will be processed and deposited on a daily basis and keypunched at CCA, our computer service bureau. Non-contributor returns will be sent to an outside keypunch facility in order to produce a magnetic tape for a follow-up mailing. (The cost for keypunching will run between 6¢ and 8¢ per name and address.)

In order to facilitate quick processing of your returns, we will add a second shift to our processing department. I will be able to give you a better idea of how long it will take to computerize the names and addresses once I receive the following:

A. Sample of mailing piece
B. Scheduled date of 2.5MM mailing
C. Date of follow-up mailing to volunteers

Please give me a call if I can be of further assistance to you.

cc: Jack Faris
Leah Charnock

PSS:bjj

8304042023

#1 - Coded by State - 95% Limit vote FSR Reserve Mail
Ronald Reagan Nat. Committee Mail
Ohio - Penn, Oregon, Wash.
Illinois - Fla.
8/26 returns

Contributors $ - white BRE w/red
Quantity -
Sept 10 returns

Republican National Committee

S00003

Ron Charnock
Director
Computer Services

August 12, 1980

Mr. Ray Grace
Creative Mailing Consultants
of America, Inc.
8800 Edgewater Drive
Capitol Heights, Maryland 20027

Dear Ray:

Enclosed please find four sets of magnetic tapes per Ed DeBolt's request.

The Ohio tapes contain approximately 392,000 voter registration names from suburban Cleveland and vicinity. The original voter registration tape format is included.

The Pennsylvania tapes include 90,182 names from Chester County, 91,635 names from Bucks County and 163,714 names from Delaware County and 55,973 names in Lehigh County. These 401,504 names are all registered Republicans.

Both files are from May of 1980.

I realize the Ohio count is significantly below the count requested by Ed DeBolt; however, I cannot in good conscience release any additional Ohio names I have and be consistent with the goals of the Commitment '80 program.

Please feel free to call me or Marcus Heth, my technical support person for this project, if you have any questions.

Sincerely,

Ron Charnock

Ron Charnock

RC:fb

CC: Dennis Whitfield

8304042025 6

August 29,1980

ıate supports the
ɔvision program titled,
ir September 13 at 1:30P.M.
ram participants, as
mbassador Bush, Chairman
ost), and Vicki Lawrence
ı theme is to motivate
ber "Crusade."

ɔspective campaign workers
ry to view the telecast
effort. The program
ng days: two in Los Angeles
production elements will
the Washington media office
ı '80 and the RNC.

8304042037

8304042025 8

"Commitment '80"
Budget Estimate
(Half hour videotape program CBS 1:30 PM EDT, Sept. 13)

PRODUCTION STAFF		
(All fees to be negotiated)		
Producer		
Director		
Writer		
Production Coordinator		
Asst. to the Producer		
Announcer (P&W includ.)		
DGA P&W		
Taxes		
		$18,050.00
TRAVEL		
Air	$2,700.00	
Hotel Accom.	1,050.00	
Per diem	650.00	
Auto rental	350.00	
		4,750.00
FACILITIES		
Engineering Eqpmt.	22,500.00	
Teleprompter	3,500.00	
Engineers	7,500.00	
Post. Prod. Editing	8,000.00	
Video tape stock	1,400.00	
		42,900.00
LIGHTING		
Equipment, Power, &Manpower	11,500.00	
		11,500.00
PRODUCTION		
Set/Props, Graphics	2,500.00	
Studio rental	4,250.00	
Stage Mgr.	800.00	
		7,550.00
TOTAL		$84,700.00

MEMORANDUM

republican national committee

001003

TO: FILE

FROM: LEAH CHARNOCK

DATE: AUGUST 28, 1980

RE: REAGAN COMMITTEE

Per Vick in the Compliance Division at the Reagan Committee I was told not to worry about eliminating Reagan Finance Committee members from our major donor list which will be receiving the Reagan Task Force package.

cc: Jack Faris

/bjj

8304042023 9

REAGAN-BUSH
Commitment '80

ST1003

THURSDAY, AUGUST 21, 1980

AGENDA

9:00 a.m.	WELCOME	
9:15 a.m.	Drew Lewis RNC Deputy Chairman	
9:30 a.m.	Ed DeBolt, President DCM Group; Consultant to Reagan for President Campaign	Overview of Commitment '80 Discussion of direct mail and September 6th cassette script
10:00 a.m.	Dennis Whitfield, Director RNC Special Projects Division	Review of key dates for Commitment '80 and materials
10:30 a.m.	Andy Carter National Director Commitment '80	Field operations and responsibilities; discussion of political ramifications of Commitment '80
#11:30 12:00 noon	Bill Brock Chairman, RNC	Lunch
1:00 p.m.	Ron Charnock, Director RNC Computer Services Division	Services from Computer Division for Commitment '80
1:15 p.m.	Dennis Whitfield	Discussion of administrative procedures
1:45 p.m.	Loren Smith, House Counsel Reagan for President Campaign	
3:00 p.m.	Adjourn	Break for I.D. pictures to be taken

***individual time with Andy Carter

8304042060

The Chairman has to leave @ 12:30

Republican National Committee, 310 First Street S.E., Washington, D.C. 20003
Paid for by the Republican National Committee

LIST OF ATTENDEES FOR 8/21 MEETING:

Will Rogers, Regional Coordinator
Southern Region II (KY, NC, TN)

M. Peck King, Regional Coordinator
**either for Western IV or III

Bo Denysyk, Regional Coordinator
Southern Region I (MD, DC, DE)

Jay Moorehead, Regional Coordinator
Northeast Region I

Kae Rairdin, Regional Coordinator
Northeast Region II (WI,MI, IL, IN)

Grant Peterson, Regional Coordinator
Western Region II (OR, ID, WA, MT)

Stuart Carter, Regional Coordinator
Western Region V (AZ, NM, AK, HI)

Cliff Leonard, Regional Coordinator
Southern Region III (AL, GA), SC, FL)

Jack Coakley, Regional Coordinator
Southern Region IV (MO AR, LA) Ms.

EXECUTIVE DIRECTORS:

Bernard Sweeney, Mass.

Dominick Di Carlo, New York

John Stirrup, New Jersey

Michael Tucker, PA

Bill Antonoplos, Ohio

Barbara Treick, Wisc.

Gail Reisch, Mich.

Sally Whalen, Ill.
J. Terryl Bechtel, Fla.

OTHER:

Russell Brown, C-80 Chairman, Indiana
Dorothy Doehney, C-80 Chairman, Texas

STEVE Dunphy - Texas
Dorothy Doehney

330420261

REAGAN·BUSH
Commitment '80

FOLDER #1 -- HOLIDAY INN INFORMATION, ETC. (one per attendee)

This folder has the individuals' name & region on the cover and contains:

1. Holiday Inn locations for region/state;
2. Holiday Inn Directory
3. Name Badge
4. Exec. Dir./Reg. Coord. information sheet which will give us their address, telephone, social security (for building i.d.) and can be handed out at the end of the meeting.

FOLDER #2 -- ADMINISTRATIVE (25 folders completed)

This folder is the same for everyone and can be passed out at the appropriate time. It contains the following:

1. Commitment '80 Overview
2. Commitment '80 Regional Map
3. September 6th Checklist
4. Commitment '80 Time Line
5. First Monday, Convention Issue
6. 1 Motivational Brochure
7. Expense Sheet (1)
8. Legal Memo from RFP
9. RNC Members
10. Procedures Manual
11. Sample Press Releases

HANDOUTS

1. Agenda
2. Home Party Kit
3. Regional Coordinator/Executive Director Listing (to be handed out after lunch, when we have all pertinent information)

HOME PARTY KIT (25 kits complete)

The home party kit materials are all inside of the 9 x 12, Commitment '80 envelope. Enclosures include:

1. #10 BRE
2. Return Card
3. NCR Sign-In Sheet
4. 3 Motivational Brochures
5. Reagan Letter
6. Press Samples
7. Tips for Host

8304042062

Republican National Committee, 310 First Street S.E., Washington, D.C. 20003
Paid for by the Republican National Committee

CASSETTE PARTY KIT (one complete)

C001273

You will have the mailing box (bogus of course) and it will contain:

1. Brochures
2. 9 x 12 BRE's
3. Sheet of Name Badges
4. NCR Sign-In Sheet
5. Banner
6. Cassette w/jiffy bag

Press Kit

8304042026 3

CAMPAIGN 80

135 WEST 50TH STREET, NEW YORK, NY 10020, TELEPHONE (212) 664-0920
901 SOUTH HIGHLAND STREET, ARLINGTON, VA 22204, TELEPHONE (703) 685-3400

August 22, 1980

Mr. Andy Carter
Commitment '80
Republican National Committee
310 First Street, S. E.
Washington, D. C. 20003

re: 9/13/80 "Commitment '80"
Thirty Minute Network Telecast

8304042025

Dear Andy:

This will serve to confirm our conversation of today regarding the thirty minute program time period purchased with your concurrence that satisfies in full our Commitment '80 broadcast time needs:

TV Network Purchased:		CBS Television Network
Airdate/Day	:	9/13/80 (Saturday)
Air-Time/Zone:	:	1:30-2 PM Eastern 12:30-1 PM Central 11:30-12 Noon Mountain 1:30-2 PM Pacific
Clearances	:	Full Network (all CBS affiliated stations) 90% + U.S. Household Coverage
Net Cost	:	$60,625.40

As noted, we have ordered all CBS stations. Nevertheless, there is no guarantee at this time that all stations will clear our program on the date ordered.

Since we will have priority markets, you indicated you could provide me with a list of areas that are "critically important" so that I can stay on top of CBS to make sure the stations in these markets air the program.

Please advise if you have any further questions.

Best regards!

Sincerely,

George S. Karalekas

George S. Karalekas
Senior Vice President
Executive Director Media

GSK:mg

cc: W. Casey
P. Dailey
R. O'Reilly
E. Callahan
S. Cohen

830404202650

REAGAN-BUSH
Commitment '80

THURSDAY, AUGUST 21, 1980

AGENDA

9:00 a.m.	WELCOME	
9:15 a.m.	Drew Lewis RNC Deputy Chairman	
9:30 a.m.	Ed DeBolt, President DCM Group; Consultant to Reagan for President Campaign	Overview of Commitment '80 Discussion of direct mail and September 6th cassette script
10:00 a.m.	Dennis Whitfield, Director RNC Special Projects Division	Review of key dates for Commitment '80 and materials
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1:45 p.m.	Loren Smith, House Counsel Reagan for President Campaign	
3:00 p.m.	Adjourn	Break for I.D. pictures to be taken

***individual time with Andy Carter

8304042026

Republican National Committee, 310 First Street S.E., Washington, D.C. 20003

Paid for by the Republican National Committee

To Dennis

Date _____ Time _____

WHILE YOU WERE OUT

M Call Harmon

of at Fla pastry hg.

Phone _____
Area Code Number Extension

TELEPHONED		PLEASE CALL	
CALLED TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		URGENT	
RETURNED YOUR CALL			

Message _____

A

Operator

8304042025?

To Dennis

Date 8-20-80 Time 3:25

WHILE YOU WERE OUT

M Diane Glass

of _____

Phone 515 225-8686
Area Code Number Extension

TELEPHONED	X	PLEASE CALL	X
CALLED TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		URGENT	
RETURNED YOUR CALL			

Message _____

Operator

To Dennis

Date 8-20-80 Time 1:15

WHILE YOU WERE OUT

M Jeff (Copeisintik

of _____

Phone (813) 463-8111
Area Code Number Extension

TELEPHONED	X	PLEASE CALL	X
CALLED TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		URGENT	
RETURNED YOUR CALL			

Message _____

Operator

To Dew

Date _____ Time _____

WHILE YOU WERE OUT

M _____

of Goldhaber

Phone _____
Area Code Number Extension

TELEPHONED		PLEASE CALL	X
CALLED TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		URGENT	
RETURNED YOUR CALL			

Message _____

Operator

To Dennis

Date 8-20-80 Time 3:30

WHILE YOU WERE OUT

M Catherine Anderson

of

Phone 484-6600
Area Code Number Extension

TELEPHONED	X	PLEASE CALL	X
CALLED TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		URGENT	
RETURNED YOUR CALL			

Message Reference to Budget Cuts

LAS
Operator

8304042026 8

PHONE-O-GRAM® for:

M Jan Cotter of

☐ Returned your call ☐ Came in

Phone Date 8/21 - 11:30 By Anita

[illegible]
National
Republican
Committee

[illegible]
Director of Public Affairs

C11003

MEMORANDUM

TO: Drew Lewis

FROM: Anne Fleig

DATE: August 22, 1980

SUBJECT: RNC Computer Systems

Mike Baroody asked me to inform you about a meeting that I attended yesterday at the Reagan-Bush headquarters regarding the sharing of our three computer systems -- Key Issue Tracking, the New York Times Information Bank, and the Associated Press Political Databank:

1) In order to expedite matters the Reagan-Bush Committee will be granted an extension of the RNC's contract with the New York Times Information Bank and the AP Political Databank. They will be issued ID numbers which will allow them to be billed separately and at no expense to us.

2) Our contract for the Key Issue Tracking System will expire the middle of September, requiring us to pay a flat fee of $3600 which entitles us to 40 hours of on-line time for one year. In dealing with the Reagan-Bush Committee, we have two options:

a) split the $3600 fee with the Reagan-Bush Committee, allowing each user 20 hours of on-line time.

b) bill the Reagan-Bush Committee on a bi-weekly or monthly basis according to the amount of time they have used.

c) House counsel says either option is acceptable. We prefer the first one. Do you have a preference?

8304042069

ORIGINAL

REPUBLICAN NATIONAL COMMITTEE

310 FIRST STREET, S.E. • WASHINGTON, D.C. 20003
(202) 484-6756

NO. 2128

DEPT. 041000-51311

MAKE CHECK PAYABLE TO REPUBLICAN NATIONAL COMMITTEE

DATE August 15, 19 80

Mike Heinrich
Campaign 80
135 W. 50th Street
Room 1111
New York, NY 10020

CHECK #	PARTICULARS	DATE	AMOUNT	APPROVAL
5620	Tape [illegible] Exceptional Speech	8/26	40.00	

CUSTOMER'S ORDER NO.	DATE SHIPPED	SHIPPED VIA	SALESMAN	OUR ORDER NO.

PREV. ORD'D	QTY. B.O.	DESCRIPTION	QTY. SHIP	UNIT PRICE	AMOUNT
S30040202		Video tape			$21 00
		Federal Express			19 00
			TOTAL		$40 00

Exceptional speech
for J. Ovnaker

AT-047

"Seller represents that with respect to the production of the articles covered by this invoice, it has fully complied with the provisions of the Fair Labor Standards Act of 1938, as amended."

MEMORANDUM

C00018

August 13, 1980

TO: Stephen Winchell & Associates, Inc.

FROM: Wiland & Associates, Inc.

Based on today's discussions of the "Reagan/RNC Target State Program," I would like to recommend the following general plan for the computer work involved:

Step 1: Immediately provide tapes of all donor names for the targeted states from the RNC, NRSC and NRCC Contributor Files; and from the Contributor Files of the Reagan, Baker, Bush and Connally presidential campaigns.

These names, along with any State Party Contributor Files which arrive early--such as the New York State File--will be merge/purged, and the net names will be split out by state and source lists.

If this work can begin immediately, it will be possible to complete it in time for Laser letters to be printed for mailing in the week of August 25.

Step 2: Approximately August 29, all State Party Files received to date will be merge/purged against the "first wave" names; the net output of this second merge/purge will then be split by state and source list and Laser printed for drop in the week of September 8.

Step 3: Approximately September 12, all remaining State Party Files will go into a merge/purge against the combined "first wave" and "second wave" names. The net output of merge/purge number three will then be Laser printed for drop in the week of September 22.

Steve, this is a general outline and obviously we stand ready to adjust it as circumstances warrant. The key to bringing off the computer processing involved will be fast delivery of all tapes--especially if additional states beyond the initial target group are factored into the program. When and if this happens, it will be essential to receive those states' files immediately as well as the donor names for those states on the three national party files and the four presidential campaigns.

8304202271

August 8, 1980

MEMORANDUM TO: DREW LEWIS
FROM: BAY BUCHANAN

Per our conversation, please find enclosed invoices totalling $82,193.67 representing expenses incurred by advertising people on behalf of the Republican National Committee. The total sum of $82,193.67 should be made payable to:

CCI, Inc.
Division of Dailey and Associates
3055 Wilshire Boulevard
Los Angeles, California 90010
Attnetion: Ms. Helen Canard

If you have any question please let me know.

BB:lp

cc: Helen Canard
John Pasquali

8304042027 2

Bailey | Deardourff

Bailey, Deardourff & Associates, Inc.
6720 Old McLean Village Drive
McLean, Virginia 22101 (703) 442-0880

INVOICE

TO: Republican National Committee
Kate Semerad
Concord Conference Program

INVOICE NO. 3267

FROM: Douglas L Bailey

DATE: July 1, 1980

JUL 2 1980

8304042027 3

Douglas L Bailey travel expenses for conference

Auto rental	$73.83
Parking	5.50
Amount due	$79.33

PAID
19043
8-5-80
PER
THANK YOU

Enclosed is an unused airline ticket
Returned

Bailey Deardourff

Bailey, Deardourff & Associates, Inc.
6720 Old McLean Village Drive
McLean, Virginia 22101 (703) 442-0880

INVOICE

TO: The Stan Parris for Congress Committee — INVOICE NO. 3474

FROM: Bailey, Deardourff & Associates, Inc. — DATE: October 20, 1980

ARTWORK PRODUCTION		
For logo, letterhead, envelope, poster, bumper strip, decal, lapel sticker, brochure, balloons, T-shirts, banner, flyer and newsrelease		
Artwork	787.50	
Graphics	1580.97	
Typesetting and photo reproductions	196.20	
Photoprints	453.12	
Color xerox	17.20	3035.08
Photography		974.88
Printing		
Balloons	114.37	
Decal	101.90	
Flyer	915.00	
Bumper strips	323.79	
Paper stock	1769.99	
Decals	476.01	
Poster	415.00	
Flyers	915.00	5031.06
Television production PAID		
post production - edit and mix	1802.57	
camera-ready art cards	56.41	1858.98
TOTAL AMOUNT DUE THIS INVOICE		10900.00

PAID 22978 10-21-80

Bailey Deardourff

Bailey, Deardourff & Associates, Inc.
6720 Old McLean Village Drive
McLean, Virginia 22101 (703) 442-0000

C40000

INVOICE

TO: Republican National Committee
Attn. Nick Longworth

INVOICE NO. 3151

FROM: John D Deardourff

DATE: October 24, 1980

Media placement for "Dick Allen for Congress Committee" for week 10-28 to 11-3.	$13,000

8304042027E

PAID
23821
10-27-80
MUR

PER _____

THANK YOU

Republican
National
Committee

Ron Charnock
Director
Computer Services

8304042716

MEMO TO: Dr. Richard Wirthlin

FROM: Ron Charnock

DATE: August 6, 1980

RE: Information Requested from the RNC

Drew Lewis asked me to provide the attached that describes the electoral information available by precinct from the RNC's computer. In addition, we have computerized returns by county for all major elections since 1960 - sort of a computerized Scammon's "America Votes" series. I've also attached a list of the demographic data available by state, county, tract or zip code. Rather than detail all additional information we have on the computer, I suggest you contact me if there's any particular piece of information you'd like to use. If we don't have it, chances are pretty good that we will know where to get it.

Drew indicated that you would be interested in producing some prioritization reports. Since I've had conversations with Bill Timmons on our targeting capabilities, I recommend we meet as soon as possible to review all Reagan for President targeting.

As you probably know, we've installed DEC CRT's and four line printers in Bay Buchanan's office. These terminals can be used to access electoral and demographic data stored on line with our data base management software, 1022. I've enclosed a users manual for 1022, should you elect to access this information. You mentioned several weeks ago that you

might be interested in transferring some of your software from your PDP-11/70 system in California to the RNC's DEC-20. My technical people have informed me that there should be little difficulty doing this. I'd be happy to arrange a meeting with my technical staff at your convenience.

CC: Drew Lewis
- Bill Timmons
BCC: BILL BROCK
RC:fb

8304042027 7

August 27, 1980

Sept 30, 1980

PRELUDE TO VICTORY DINNERS

COMMITTED CO-CHAIRMEN

ATLANTA — Marriott (Courtland) Hotel

Hon. Paul Coverdell 404/355-8880
Coverdell Insurance Group
2015 Peachtree Street, N.E.
Atlanta, GA 30309

BOSTON — hotel pending

Robert A.G. Monks 617/722-7138
Chairman of the Board
The Boston Company
One Boston Place
Boston, MA 02106

Lloyd Waring 617/542-6200
82 Devonshire
Boston, MA 02109

Joseph Cunningham 617/482-5270
Post Office Box 1647
Boston, MA 02105

CINCINNATI — hotel pending — conv. center

West Shell 513/721-4200
West Shell, Inc.
3 East 4th Street
Cincinnati, OH 45202

CLEVELAND — hotel pending — Stouffers

Mr. Sam Miller 216/267-1200
Forest City Enterprises
10800 Brookpark
Brooklyn, OH 44130

DENVER — hotel pending

Joseph Coors 303/279-6565
Adolph Coors Company
Golden, CO 80401

8304042027 8

HONOLULU — hotel pending

~~John Rogers~~ 808/544-6200
C. Brewer & Co., Ltd.
Post Office Box 1826
Honolulu, HI 96805

→ Julia Ing 808/732-2946
3759 Diamond Head Road
Honolulu, HI 96816

JACKSONVILLE — hotel pending

Peter Gregg 904/724-1080
10211 Atlantic Boulevard
Jacksonville, FL 32211

KANSAS CITY Ks + MO — Hyatt Regency — Missouri

B.B. Andersen 913/233-2381
Post Office Box 1692
Topeka, KS 66601

Charles Price 816/931-4422
Price Candy Company
One West Armour
Kansas City, ~~KS~~ MO 64111

LOS ANGELES — Beverly Hilton

Robert and Betty Adams 714/742-3891
Post Office Box 468
Valley Center, CA 92082

Lt. Gov. Mike and Linda Curb 916/445-9533
Room 1028
State Capitol
Sacramento, CA 95814

Fred and Helen Gottfurcht 213/272-8264
9454 Wilshire Boulevard
Suite 3209
Beverly Hills, CA 90212

Jean and William French Smith 213/488-7236
515 South Flower Street
Los Angeles, CA 90071

8304042027 9

NASHVILLE — Hyatt Regency

Mrs. William Cook (Carol) 615/259-4033
510 Gay Street
Suite 306
Nashville, TN 37219

NEW YORK - NJ CT — Waldorf Astoria

John Whitehead 212/676-8000
55 Broad Street
New York, NY 10004

Jerry Milbank 212/682-6710
Suite 1650
60 East 42nd Street
New York, NY 10017

Ray Donovan (New Jersey area) 201/867-5070
54 Merrywood Lane
Short Hill, NJ 07078

OKLAHOMA CITY — Skirvin Plaza

J.D. Allen 405/840-3551
1101 Oil Center West
2601 Northwest Expressway
Oklahoma City, OK 73112

BRAD BURNHARDT

PHILADELPHIA — Union League Club

Howard Peterson 215/985-8384
Room 742 Fidelity Building
Broad & Walnut Street
Philadelphia, PA 19109

PHOENIX — Registry Hotel

John B. Conlon 602/978-3536
Suite 211
4120 North 70th Street
Scottsdale, AZ 85251

Charles H. Keating 602/957-7170
American Continental Corporation
2621 East Camelback Road
Suite 150
Phoenix, AZ 85016

8304042028C

SAN FRANCISCO — hotel pending

Gordon Edwards 415/433-1841
Suite 1106
601 Montgomery Street
San Francisco, CA 94111

Woodward Kingman 415/477-7271
Crocker National Bank
One Montgomery Street
San Francisco, CA 94104

Robert W. Maier, President 415/982-8400
Dancer, Fitzgerald & Sample, Inc.
1010 Battery Street
San Francisco, CA 94111

ST. LOUIS — St. Francis Hotel

John Hanley 314/694-1000
Chairman, President, and CEO
Monsanto Company
800 North Lindbergh Boulevard
St. Louis, MO 63166

TULSA — Southern Hills Country Club

Ralph Abercrombie 918/582-2247
H. A. Chapman Investments 918 582-2247
404 Cities Service Building
Tulsa, OK 74119

WASHINGTON, D. C. VA, md — Capitol Hilton

Robert Gray (Bob) 202/638-2800
Vice Chairman, Hill & Knowlton, Inc.
1425 K Street, N.W. Suite 1000
Washington, D.C. 20005

SALT LAKE CITY — hotel pending

William A. Stevenson. 801/532-7967
345 South State Street - Suite 107
Salt Lake City, UT 84111

8304042028 I

[redacted]E hotel pending

Gary McCauley 303/597-5050
1219 North Academy
Colorado Springs, CO 80909

WICHITA hotel pending

Wayne Horst 316/267-7482
140 North Main Street
Wichita, KS 67202

Joseph Doolittle 316/942-7471
6500 Kellogg Street
Wichita, KS 67209

8304042028 2

June 6, 1980 – St. Francis Hotel
San Francisco, California

8304042029

8304042028

ALABAMA REAGAN BUSH COMMITTEE

Co-Chairmen

Guy Hunt
Route 2, Box 78
Holly Pond, Alabama 35083

Bill Harris
Box 3146
Holly Pond, Alabama 35083

ALASKA REAGAN BUSH COMMITTEE

Chairman

Marilyn J. Gay
1710 South Salem Drive
Anchorage, Alaska 99504

ARIZONA REAGAN BUSH COMMITTEE

Chairman

Tom Van Sickle
6991 East Camelback Road
Scottsdale, Arizona 85251

ARKANSAS REAGAN BUSH COMMITTEE

Honorary Co-Chairmen

Congressman Ed Bethune
1330 Longworth House Office Building
Washington, D. C. 20515

Congressman John Paul Hammerschmidt
2160 Rayburn House Office Building
Washington, D. C. 20515

Co-Campaign Managers

Bo Holloman
Route 1, Box 130
Wynne, Arkansas 72396

Sharon L. Shipley
3500 South Boston
Fort Smith, Arkansas 72903

CALIFORNIA REAGAN BUSH COMMITTEE

Chairman

Mr. Jack Courtemanche
9841 Airport Boulevard #1430
Los Angeles, California 90045

COLORADO REAGAN BUSH COMMITTEE

Chairman

Mrs. Holly Coors
56 Steele Street
Denver, Colorado 80206

CONNECTICUT REAGAN BUSH COMMITTEE

Chairman

The Honorable John David Lodge
129 Eston Road
Westport, Connecticut 06880

DELAWARE REAGAN BUSH COMMITTEE

DISTRICT OF COLUMBIA REAGAN BUSH COMMITTEE

FLORIDA REAGAN BUSH COMMITTEE

Chairman

Tommy Thomas
Post Office Box 311
Tallahassee, Florida 32302

GEORGIA REAGAN BUSH COMMITTEE

Chairman

Ted Stivers
Post Office Box 1728
Decatur, Georgia 30031

HAWAII REAGAN BUSH COMMITTEE

Chairman

Rep. Kina'u Boyd Kamali'i
House of Representatives
State Capital Hawaii
Honolulu, Hawaii 96813

IDAHO REAGAN BUSH COMMITTEE

Chairman

Senator James McClure
Post Office Box 1631
Boise, Idaho 83731

8304042 00285

ILLINOIS REAGAN BUSH COMMITTEE

Chairman — Mr. Don Totten
Post Office Box 94576
Schaumburg, Illinois 60194

INDIANA REAGAN BUSH COMMITTEE

Chairman — Dr. Dennis J. Nicholas
5300 Far Hill Court
Indianapolis, Indiana 46226

IOWA REAGAN BUSH COMMITTEE

Chairman — Mr. Ray Haigie
Route 2
Clarion, Iowa 50525

KANSAS REAGAN BUSH COMMITTEE

Chairman — Mr. Pete McGill
Box 493
Winfield, Kansas 67156

KENTUCKY REAGAN BUSH COMMITTEE

Chairman — Mr. Larry Forgy
Tarrent, Combs & Bullitt
2600 Citizens Plaza
Louisville, Kentucky 40202

LOUISIANA REAGAN BUSH COMMITTEE

Honorary Chairman — Governor David Treen
Office of the Governor
Box 44004
Baton Rouge, Louisiana 70804

Co-Chairmen — Congressman W. Henson Moore
2444 Rayburn House Office Building
Washington D. C. 20515

Congressman Bob Livingston
130 Cannon House Office Building
Washington, D. C. 20515

Campaign Manager — John Cade
Box 1830
Alexandria, Louisiana 71301

8304046 0286

MAINE REAGAN BUSH COMMITTEE

Chairman

Mr. Howard Dana, Jr.
Two Canal Plaza
Portland, Maine 14112

MARYLAND REAGAN BUSH COMMITTEE

Chairman

Dr. Don Devine
11141 Georgia Avenue
Wheaton, Maryland 20902

MASSACHUSETTS REAGAN BUSH COMMITTEE

Chairman

Senator David H. Locke
Jameson Locke & Fullerton
8 Grove Street
Wellesly, Massachusetts 02181

MICHIGAN REAGAN BUSH COMMITTEE

Chairman

John R. Gnau, Jr.
3894 Peabody Drive
Bloomfield Hills, Michigan 48013

MINNESOTA REAGAN BUSH COMMITTEE

Co-Chairmen

Marsie Leier and Tom Haggedorn
555 Wabasha, Suite 1-E
St. Paul, Minnesota 55102

MISSISSIPPI REAGAN BUSH COMMITTEE

Chairman

Congressman Trent Lott
2400 Rayburn House Office Building
Washington, D. C. 20515

State Headquarters
Post Office Box 20363
Jackson, Mississippi 39209

MISSOURI REAGAN BUSH COMMITTEE

8304042 00287

MONTANA REAGAN BUSH COMMITTEE

Chairman

Archie Lucht
112 Crestline Drive
Big Forks, Montana 59911

NEBRASKA REAGAN BUSH COMMITTEE

Chairman

Milan Bish
Box 1365
Grand Island, Nebraska 68801

NEVADA REAGAN BUSH COMMITTEE

Chairman

Reese H. Taylor, Jr.
Post Office Box 646
Carson City, Nevada 89701

NEW HAMPSHIRE REAGAN BUSH COMMITTEE

Chairman

Governor Lane Dwinnell
51 High Street
Manchester, New Hampshire 03104

NEW JERSEY REAGAN BUSH COMMITTEE

Chairman

Raymond Donovan
54 Mary Wood Lane
Shorthille, New Jersey 07078

NEW MEXICO REAGAN BUSH COMMITTEE

Chairman

Mr. Frank Bird
4200 Carlisle, N. E.
Albuquerque, New Mexico 87107

NEW YORK REAGAN BUSH COMMITTEE

Co-Chairmen

Dr. James F. X. O'Rourke
23 West 52nd Street
New York, New York 10019

Dominick L. DiCarlo
23 West 52nd Street
New York, New York 10019

NORTH CAROLINA REAGAN BUSH COMMITTEE

8304040286

NORTH DAKOTA REAGAN BUSH COMMITTEE

Chairman

Kye Trout
Post Office Box 1376
Bismarck, North Dakota 58501

OHIO REAGAN BUSH COMMITTEE

Chairman

The Honorable Samuel Devine
200 North High Street, Room 400
Columbus, Ohio 43215

OKLAHOMA REAGAN BUSH COMMITTEE

Honorary Chairman

Congressman Mickey Edwards
413 Cannon House Office Building
Washington, D. C. 20515

Co-Chairmen

Betty Brake and Ed Calhoun
123 Northwest 23rd Street
Oklahoma City, Oklahoma 73103

OREGON REAGAN BUSH COMMITTEE

Chairman

Diana Evans
Post Office Box 578
Salem, Oregon 97308

PENNSYLVANIA REAGAN BUSH COMMITTEE

Chairman

Richard J. Fox
The Fox Companies
#1 Bala-Cynwyd Plaza, Suite 100
Bala-Cynwyd, Pennsylvania 18004

RHODE ISLAND REAGAN BUSH COMMITTEE

Chairman

Mr. James DiPrete
c/o DiPrete & Associates,
1150 New London Avenue
Cranston, Rhode Island 62920

SOUTH CAROLINA REAGAN BUSH COMMITTEE

Chairman

Congressman Carroll Campbell
Post Office Box 11896
Columbia, South Carolina 29205

8304040289

SOUTH DAKOTA REAGAN BUSH COMMITTEE

Chairman

Nora Hussey
507 Kansas City
Rapid City South Dakota 57701

TENNESSEE REAGAN BUSH COMMITTEE

Chairman

Jere Griggs
624 Royal Oaks Place
Nashville, Tennessee 37205

TEXAS REAGAN BUSH COMMITTEE

Chairman

Governor Bill Clements
1100 Colorado
Austin, Texas 78701

UTAH REAGAN BUSH COMMITTEE

Chairman

Bob Sykes
359 South State Street #400
Salt Lake City, Utah 84111

VERMONT REAGAN BUSH COMMITTEE

Chairman

Mr. Lawrence A. Wright
19 Scottsdale Road
South Burlington, Vermont 05401

VIRGINIA REAGAN BUSH COMMITTEE

Co-Chairmen

Paul Trible
Helen Obenshain
Al Cramer
State Headquarters
106 North Eighth Street
Richmond, Virginia 23219

WASHINGTON REAGAN BUSH COMMITTEE

WEST VIRGINIA REAGAN BUSH COMMITTEE

8304042 0029 0

WISCONSIN REAGAN BUSH COMMITTEE

Co-Chairmen

Don Taylor
100 Bank Street
Waukesha State Bank
Waukesha, Wisconsin 53186

Mrs. Helen Bie
135 East Whitney
Greenbay, Wisconsin 54301

WYOMING REAGAN BUSH COMMITTEE

Chairman

L. V. Stafford
25 North Main Street
Box 820
Buffalo, Wyoming 82834

8304042002911

Republican
National
Committee

Ron Charnock
Director
Computer Services Division

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REAGAN FOR PRESIDENT CPA SYSTEM
DECISION POINTS

1. Install the computer equipment in the Reagan for President Headquarters no later than July 25th.

2. Complete the Accounts Payable, General Ledger and Payroll system tests for the Reagan for President file no later than July 24th.

3. Alter the existing RNC accounting forms to meet the specific needs of the RFP system no later than August 1st.

4. Appoint or hire an "Amy Gilbert" or "Katherine Anderson" type of individual for the RFP treasurer's office.

5. Hire an experienced data entry staff, along with related clerical help no later than July 25th.

6. Document the RFP organization structure and related authorization responsibilities along with an operating manual that details a set of procedures for the controlling of financial expenditures no later than July 31st.

7. Discuss the possibility of transferring, at least on a temporary basis, RNC Computer Services technical help to the RFP treasurer's office.

8. Hire or appoint a payroll clerk responsible for the coordination of all payroll information of the payroll interface with the RNC.

9. Schedule all additional training for RFP staffers including:

   a. Payroll training for payroll clerk.

   b. Data entry training for data entry staff. 7/28 see Kathie

   c. Additional procedural training for all RFP staffers.

   d. The availability of support staff for TCI. August 4th

10. Discuss the possibility of Bay Buchanan chairing a meeting for senior RFP management on the procedures related to the control of financial expenditures, a review of the management reports, and a discussion of other anticipated accounting/campaign relations.

11. Begin processing RFP cost center budget information no later than July 31st.

12. Begin computerizing the RFP Vendor file as soon as possible.

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MEMORANDUM

July 16, 1980

FROM: Reagan for President Chief
Counsel, Loren Smith
Telephone: (703) 685-3400

SUBJECT: What state and local Republican organizations can do during the general election campaign

The Federal election laws allow certain expenditures by "State or local committees of a political party" in addition to the expenditures that may be made by the presidential candidate and the party national committee. These additional local or state expenditures may be coordinated with the candidate's campaign. All these exemptions are based upon these expenditures being connected with volunteer activity. They are allowable under the following categories:

1. Any printed material or its mailing listing at least three candidates for public office (local, state or federal). This category, however, does not allow a state or local committee to pay for any broadcasting, newspapers or other similar "general public political advertising." (2 USC §431 (8) (B) (v); (9) (B) (iv)).

2. Any payments for the costs of campaign materials (such as buttons, bumper stickers, handbills, brochures, posters, party tabloids, or yard signs). The law does not allow for the payment of materials or activities in connection with media or direct mail. The law specifically does not allow the money used in this exemption to either violate the limits (no corporate money or money that would violate the contributor's federal limit) or be earmarked contributions (money designated by a contributor only to be spent on Reagan pins for example).
(2 USC §431 (8) (B) (x); (9) (B) (viii)).

3. Any payments for the costs of voter registration or get-out-the-vote activities conducted specifically on behalf of the party nominees. The same limitations apply here as in #2 above. This exemption may include phone banks. If the phone banks are used by other candidates as well only the portion of the cost attributable to the presidential candidate need be paid out of federal-limit funds. Professionals may design and supervise the phone banks as long as volunteers make the calls.
(2 USC §431 (8) (B) (xii) (9) (B) (ix)).

Some additional points and suggestions about these activities by a state or local Republican committee:

A. There is no limit on the amount of money a state or local committee may spend on behalf of the Republican presidential nominee under these exemptions. However, once the amount exceeds $5,000.00 federal reporting is required. Therefore, a separate account should be

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established to keep the entire local or state committee from becoming a political committee.

B. Exemptions 2 and 3, unfortunately, apply only to the presidential nominee, not the congressional candidates. Joint efforts under these programs must either be party contributions to the congressional candidates, allocable party coordinated expenditures on behalf of such candidates, or reimbursed by those candidates. However, an incidental mention of a congressional candidate on materials or in get-out-the-vote programs for the nominee does not count as a contribution to that congressional candidate.

C. The Republican National Committee may not directly fund state or local committees with money or materials for their use under the exemptions. Any such funding would be directly chargeable under the RNC's own coordinated expenditure limit.

D. Direct mail has a special meaning in this area. It refers to mailing to lists that are not generated by the state or local party committee. Thus, under #2 and #3, the local or state committees can do mass mailings to lists they either generate themselves or purchase from governmental sources. This is a particularly important exemption in some areas.

E. State or local candidates may specifically pay for their own share of these projects. As long as the amount doesn't exceed their fair share the state or local committees may still spend up to $5,000 on the federal share without becoming a reporting political committee or account.

F. A state or local committee that is already a political committee under the Federal law may take advantage of these exemptions to the same extent as any other local committee. The amounts spent are not contributions to any candidate, though they must be reported as disbursements.

G. It is legal and proper for the national campaign to authorize a common national source to supply state and local party committees with standard type supplies for their activities. These would have to be sold to the committees, as any discount for non-economic reasons would be a contribution beyond the exemption. It would

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also be proper for the campaign to have a designated central list or group of phone bank experts to establish the phone banks under #3. The local committees could then pay for the costs of their services for their individual operations.

H. Some specific projects:

(a) Use state or local headquarters as Reagan volunteer centers for the various exempt functions listed in #1, #2, and #3.

(b) Establish get-out-the-vote phone banks run by volunteers.

(c) Print up and mail get-out-the-vote literature, materials and forms for the volunteer projects of Commitment '80.

(d) Order as many buttons, bumper strips, etc., from the centrally designated suppliers, or produce own.

(e) Raise as much money as possible for these activities. Contributions must not be earmarked or made to Reagan for President, but to the local or state party organizations. It must comply with the Federal limits, even though no reporting is required if the amount spent doesn't exceed $5,000.

(f) Exempt Reagan materials that may be produced or reprinted by the local or state party organizations include: brochures, yard signs, bumper strips, car tops, buttons, matchbooks, flyers, sample ballots, trinkets, jewelry, etc. These only require the disclaimer (Paid for and authorized by _____, County, City, State, etc. Republican Organization or Committee) if they are large enough. Not on buttons, for example.

(g) Joint materials may be prepared under the guidelines in (f) with other federal or state or local candidates. However, only exemption #1 applies to congressional candidates. Thus, if a local party prints up a Reagan - Jones for Senator bumper strip, the portion of the material's cost attributable to Jones' campaign (say 50%) must either be paid for by Jones' campaign, or count as an in-kind contribution or coordinated expenditure chargeable against the state's federal limits. A further however, the

Federal law says that if the mention of the Senator or House candidate is incidental to the primary thrust of the material, then no legal contribution occurs.

(h) None of this state or local activity has anything to do with the concept of "independent expenditure". It can be legally coordinated with the campaign, though the state or local party must raise and spend its own money. A state or local party may not legally make any independent expenditure nor work with such independent groups.

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Republican National Committee

Ron Charnock
Director
Computer Services

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MEMO TO: Gerry Carmen

FROM: Ron Charnock

DATE: April 28, 1980

RE: Computer Systems Available at the RNC

In response to your request, I've attached a list of computer systems and data files maintained by the Computer Services Division of the RNC. Some of the information may require a more detailed inventory, which I would be pleased to provide if your project requires more information.

As you know, we call our computer system REPNET, which stands for the Republican Party Data Processing Network. I've included a technical description of the two computer systems that are the heart of REPNET. In addition, we have on-going relationships with a number of other computer processors. The economics of data processing, with its high degree of fixed versus variable costs, dictate that we process peak load situations on out-of-house computer systems as opposed to buying a huge machine that would handle peak loads, but only be marginally filled the rest of the time.

Our computer system can be accessed from any point in the country through its connection with TELENET. I've enclosed some technical information on the network.

As always, I'd be happy to answer any additional questions you might have.

RC:fb

MEMO TO: Drew Lewis
FROM: Bay Buchanan
RE: Katherine Anderson
DATE: July 2, 1980

As your assistant at the Republican National Committee and considering her knowledge and previous experience, Katherine Anderson can be a valuable asset to me in the following capacities:

1. Advising and coordinating the processing of the RFP payroll through the RNC.

2. Advising on the initial planning and design of the work flow with respect to accounting, computer, and control needs.

3. Controlling the $4.7 million the RNC may legally spend on behalf of the campaign.

The only time she would be required to spend away from the RNC will be the week following the convention, for one-half day each day, which she would spend at the RFP campaign headquarters.

In addition, it may be valuable to both the RNC and to RFP to involve Katherine in a number of my analysis and review meetings.

Let me know if such an arrangement is agreeable to both you and Katherine.

Thank you.

8304042029

National Committee

Michael E. Baroody
Director of Public Affairs

July 1, 1980

M E M O R A N D U M

TO: Drew Lewis
Fred Biebel
Dr. Richard B. Wirthlin

FROM: Anne Fleig

RE: Computer Capabilities

The RNC currently subscribes to four computer systems out-of-house (KIT, NYTIB, AP Political Databank, Legi-slate) and one in-house. Following is a brief description of their capabilities:

1) The New York Times Information Bank provides detailed, informative abstracts of newspaper and magazine articles relating to hundreds of different subjects. The data base contains all the news and editorial material from The New York Times and partial material from 70 other publications (see attachment 1).

2) The Key Issue Tracking System is a constantly updated data base that allows users to monitor current issues on a continuing basis. Over 200 key issues, 350 individual names and 250 organization names are currently stored in the KIT data base. Data base sources: The New York Times, Associated Press Washington, Newsweek, and over 50 other major publications (see attachment 2).

3) The Associated Press Political Databank is a constantly updated electronic library tracking the 1980 campaign year. It examines the issues and the candidates for the Presidency and for statewide offices(see attachment 3).

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[redacted]

[redacted] CO NUMBER: CH570 [redacted]

1. RV NUMBER: RV565 2. HOUSE TYPE: HR2043 3. [redacted]
4. REPORT NUMBER: 5. COMMITTEE: 6. FINAL PASS OF:

7. AMENDMENT:

8. SPONSORS 9. PARTY 10. STATE

12. DATE: 11/14/79 14. OUTCOME: PASSED

15. TOTAL FOR: 301 16. TOTAL AGAINST: 99
17. REP. FOR: 59 18. REP. AGAINST: 74
19. DEM. FOR: 232 20. DEM. AGAINST: 25

21. BILL EFFECT:
22. BUDGET AUTHORITY: 23. REVENUES:
24. OUTLAYS: 25. DEFICIT:

26. TITLE: PUBLIC WORKS AND ECONOMIC DEVELOPMENT

27. ISSUES:
1) AUTHORIZATIONS
2) DOMESTIC AFFAIRS
3) ECONOMIC AID
4) EMPLOYMENT
5) UNEMPLOYMENT
6) COMMERCE

28. MODIFIERS:
1) PUBLIC WORKS
2) ECONOMIC IMPACT
3) STATE AND LOCAL LEVEL
4) URBAN DEVELOPMENT
5) RURAL DEVELOPMENT
6) FISCAL YEAR 1980
7) FISCAL YEAR 1981
8) LOANS

30. DESCRIPTION

PASSAGE OF THE BILL TO EXTEND PUBLIC WORKS AND DEVELOPMENT FINANCING PROGRAMS FOR ECONOMICALLY DEPRESSED AREAS FOR TWO YEARS, THROUGH FISCAL 1981, AUTHORIZE REGIONAL DEVELOPMENT COMMISSIONS TO REPLACE THE EXISTING SYSTEM OF REGIONAL ACTION PLANNING COMMISSIONS; EXTEND THE APPALACHIAN REGIONAL DEVELOPMENT ACT, AND ESTABLISH A STANDBY LOCAL PUBLIC WORKS PROGRAM TO BE ACTIVATED DURING PERIODS OF HIGH UNEMPLOYMENT.

1. J. ANDERSON ..... DID NOT VOTE

Attachment 4

[illegible]

[illegible] Legi-Slate? [illegible] Legi-Slate [illegible] reports [illegible] everything in the computer is checked and re-checked, proofed and re-proofed. Even the analysis and keywording of new bills is done twice by different editors.

The Legi-Slate computer operates 24 hours a day, including weekends. You can dial it from literally anywhere you can find a telephone, including most foreign countries—and there is never a charge for long distance.

Who needs Legi-Slate?

Anyone who needs to know quickly and accurately about Congress should see a demonstration of Legi-Slate: corporations and other business organizations, law firms, trade and professional associations, government agencies, labor unions, schools and universities, chambers of commerce, political action committees, the media, and others.

What does Legi-Slate cost?

For one low monthly fee, you get the use of our computer terminal, your private sign-on number, training and the ability to begin tracking bills and votes *immediately*.

[illegible] Legi-Slate [illegible] your staff [illegible].

Legi-Slate costs less than half of what you may now budget for one staff member. And Legi-Slate can provide much more information than a *small* staff members—faster, more accurately and cheaper.

"I had to see it to believe it!"

That's the usual reaction when people see Legi-Slate for the first time, and we think you will agree. Give us 15 minutes to demonstrate this new service in your office—but be prepared to keep us there an hour!

Call 547-4140 to schedule a demonstration in your office at your convenience and without obligation.

(Outside Washington, please call collect, Area Code 202.)

Get [illegible] reports of Congressional action

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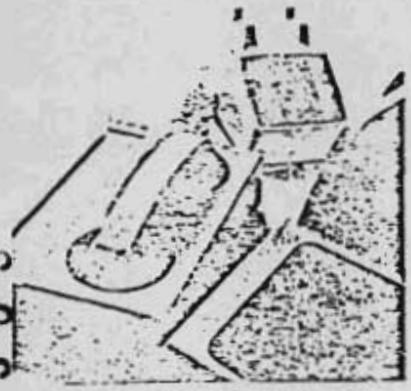

Simply dial the Legi-Slate computer on your telephone.

What is Legi-Slate?

Legi-Slate is a computerized bill tracking system. It is designed for people who know nothing about computers, but need to know quickly about Congress.

You simply dial the Legi-Slate computer on your telephone to get private reports of Congressional action (or inaction) on the special typewriter terminal we provide.

Everything is in plain English, question and answer form. There is no computer jargon.

What information is in the computer?

Legi-Slate's computer contains a complete history of all bills and resolutions. *Every one,* as current as yesterday and as far back as the start of the 96th Congress. Here is what we put in the computer:

- *A synopsis of every bill and resolution,* including the official title and short title; the sponsor and co-sponsors (even co-sponsors *withdrawn*), keyword subject references based on our analysis of the entire measure; citations of existing laws referenced in the measure; and see-also references to locate identical or similar measures.
- *Committee and subcommittee actions,* including original and subsequent referrals; notice of hearings and mark-ups; and notice of committee reports.
- *Floor and [illegible] actions,* including status of rules which make exceptions to or amendments of the rules of the chambers.
- *All votes taken, in full and recorded,* including names of individual members for all recorded votes and quorum calls.

How can Legi-Slate track bills?

Each day, you use Legi-Slate to search for new bills or resolutions introduced on subjects of special interest to you. Any you find are then added to a private list you tell the computer to keep track of for you. From that moment on, you can ask Legi-Slate's computer for the current status of your private list of bills—at the touch of a button.

And you can have the computer watch several different lists for you at once (perhaps grouped by different subjects), with no limit on the number of bills in each list.

How can Legi-Slate track votes?

First, Legi-Slate helps you locate quickly any recorded vote of special interest, showing the overall tally for or against.

Once you have located the vote, Legi-Slate can instantly show you how each member voted. And you can choose how you want the vote analyzed: by political party, by state, by geographical region. Or you can create your own private "caucus" of members of particular interest to you. From then on, you can see immediately how your "caucus" voted on any recorded vote.

You can even tell Legi-Slate's computer which votes you have selected to rate the voting performance of the members. After you enter that list, Legi-Slate can show you a [illegible] percentage of the time they voted for or against [illegible] (or didn't vote).

Attachment 4

[illegible]

[illegible]
Find K: (...state) and K: Key Pol...

How are the campaigns shaping up in individual states. Over the next few months, we will be putting in a new summary for each state that looks at the issues and personalities of Carter, Reagan and Anderson. You will be able to get them by typing:

Find K: (state) and K: Campaign and K: Summary

The previous summaries that looked at the separate party battles in each state will remain in the Political Databank as a record of the primary or caucus-convention results. You can get them by typing:

Find K: (state) and K: President and K: Summary

Speaking of primary results, you can get summaries of the results of the two parties' 1980 primaries by typing:

Find K: (party) and K: Primary and K: Results and K: Summary

If you would like a rundown on the turnout by voters in the primaries, just type:

Find 'K: Voter Turnout' and K: Summary

The Political Databank also is keeping up with the independent challenge by John Anderson, as well as keeping tabs on some of the third parties.

What are the deadlines Anderson faces for getting on the ballot? To find out, just type:

Find K: Anderson and 'K: Ballot Access' and K: Dates

What happens if Anderson's participation in the general election throws the presidential selection to the Congress?

Find K: Congress and K: Role and K: Anderson

(For a summary of Congress' role in past elections, type:

Find K: Congress and K: Role and K: History)

How about some of the small third parties?

Find 'K: Third Party' and K: Campaign and K: Summary

(For the history of third parties, type:

Find 'K: Third Party' and K: History and K: Summary)

As always, we're eager to help if you have problems finding something in the Political Databank. You may call the Political Databank at our number toll-free at 1-800-[illegible], or you may call the AP Political Databank office at 212-262-7743.

The AP Political Databank

[illegible]

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AP POLITICAL DATABANK INFORMER No. 2

With the primary season over, attention has shifted to the political nominating conventions: the electrifying fight between Carter and Kennedy, the search for a Republican vice presidential candidate, the party platforms. The AP Political Databank can help you keep up with the developments.

Once the conventions begin, we will be inputting the major convention stories that move on the AP's national news wires as well as the major roll call votes. But even before the gavel hammers the GOP convention open on July 14, the Political Databank has a lot of helpful information.

Do you want to know the convention schedules? Just type:
Find K: (party name) and K: Convention and K: Schedule

What about the development of the party platforms?
Find K: (party) and K: Platform and K: Summary

How about the looming rules fight between Carter and Kennedy?
Find K: Democratic and K: Rules and K: Fight

What are the party rules?
Find K: (party) and K: National and K: Rules and K: Summary

What is the speculation on GOP vice presidential possibilities?
Find K: Republican and 'K: Vice President' and K: Summary
(More extensive information can be found by typing:
Find K: Story and 'K: Vice President')

How about background on the vice presidential choices? A biography of Walter Mondale is in the system now as:
K: Mondale and K: Biography and K: Text
We will add a biography of the GOP choice as soon as he or she is named.

The latest delegate totals, mainly an issue now in the Democratic contest, are under:
K: National and K: Count and K: Current
State-by-state versions are under:
K: State-by-state and K: (party) and K: Count

We also are gathering the names and addresses of every national convention delegate and alternate and will be putting them in the system over the next few weeks. They will be found by typing:
Find K: (state) and K: (party) and K: Delegate and K: Names

Now, let's take a look forward to the post-convention presidential fight.

We will be expanding the issues portion of the Political Databank as now issues crop up, and we will continue to watch for [illegible] as they arise on the issues.

We also will be taking a look at what the [illegible] say as they [illegible] with their record. The [illegible] for Reagan-Bush is in and can be found

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Attachment 3

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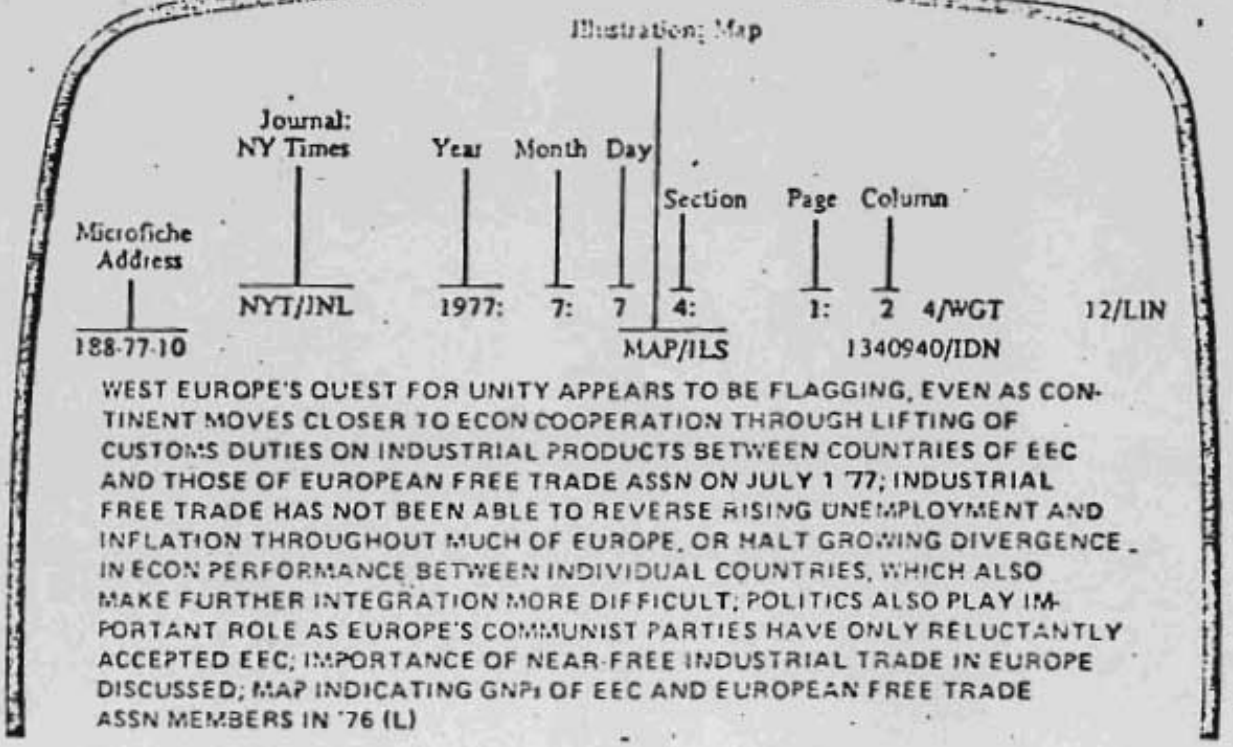
[illegible] citation for the original article. Beyond the [illegible] contained in the abstracts, however, many questions can be [illegible] without [illegible] to the full text.

A sample page of Information Bank abstracts is reproduced below with the key bibliographic elements identified.



Information Bank subscribers who want large files printed out, or who wish to produce an attractively-bound report that can be passed along to someone else, can request "Deferred Print" on The Information Bank's own high-speed computer printer. On such reports, the basic bibliographic information is printed below the abstract in a format which requires no knowledge of Information Bank abbreviations:

EEC has issued '78 directive that calls for equal treatment for women workers and gives member states 30 mos to eliminate existing discriminatory clauses in working contracts; EEC Women's Affairs Bur head Jacqueline Nonon comments; illus (M)
NEW YORK TIMES JULY 5, 1977
PAGE: 34 COLUMN: 1 FICHE: 186-77-61

CORPORATE HEADQUARTERS
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(703) 243-7220
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Suite 1400
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(312) [illegible]
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Suite [illegible]
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(213) [illegible]

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(416) [illegible]

* LONDON, ENGLAND
3rd Floor
Morgan House
[illegible] St.
London, WC 2
01-[illegible]

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INDIVIDUALS

KIT supplies a unique perspective on major issues because users can "observe" and monitor the continuing impact of 350 key individuals on these issues. Currently in addition to the names of every major national and international political figure, the KIT system also contains top names in such fields as law, labor, science, education, energy, economics and industry. Business users will find it invaluable to be able to track the positions of such leaders as: Sheik Ahmed Al Yamani ... W. Michael Blumenthal ... Joseph Califano ... A. W. Clausen ... John Kenneth Galbraith ... Alan Greenspan ... Milton Friedman ... Armand Hammer ... Alfred E. Kahn ... Henry Kissinger ... Robert S. McNamara ... George Meany ... G. William Miller ... Thomas A. Murphy ... David Rockefeller ... Irving S. Shapiro ... William E. Simon ... Edgar Speer – and many others.

ORGANIZATIONS

The 250 organization names that serve as another "access" mode for KIT include those of major corporations; associations; government, scientific and military institutions; consumer groups; labor unions – and many key legislative committees. One can see the scope of KIT's usefulness to the business community by mentioning just some of the national organizations now on-line: The Brookings Institution, Conference Board, Consumer Products Safety Commission, General Accounting Office, Iron and Steel Institute, OSHA, New York Stock Exchange, Wage-Price Council, etc. On the international level, KIT's roster of organization names ranges from The World Bank, GATT and the EEC – to the PLO.

This directory is the key user guide to the system, explaining search procedures and techniques for tracking issues. As the course of national and world events affects the issues, individuals and organizations now on-line in the KIT system – additions will be made immediately, and updated directory pages will be issued monthly.

THE INFORMATION BANK

CORPORATE HEADQUARTERS

SALES OFFICES

I. THE NEW YORK TIMES

Virtually all news and editorial matter from the final Late City Edition, including all Sunday and regional feature sections, is included in the data base. New York Times material extends back to January 1, 1969. Current issues are processed within four or five working days after publication. Front page and leading business news items are available within 24 hours of publication. A comprehensive daily News Summary based on that morning's New York Times is available Monday through Friday at 9 AM Eastern Time.

II. OTHER PUBLICATIONS

General Circulation Newspapers:

Atlanta Constitution
Chicago Tribune
Christian Science Monitor
Houston Chronicle
Los Angeles Times
Miami Herald
New York Times
San Francisco Chronicle
Washington Post

Business Publications:

Advertising Age
American Banker
Automotive News
Barron's
Business Week
Dun's Review
Editor and Publisher
Financial Times (Canada)
Financial Times (London)
Forbes
Fortune
Harvard Business Review
Journal of Commerce
Wall Street Journal
Women's Wear Daily

International Affairs:

Atlas
Economist of London
Far Eastern Economic Review
Foreign Affairs
Foreign Policy
Latin America Economic Report
Latin America Political Report
Manchester Guardian
Middle East
Times of London

Science Publications:

Astronautics
Aviation Week and Space Technology
Bulletin of Atomic Scientists
Industrial Research
Science
Scientific American

Other Periodicals:

Atlantic
California Journal
Consumer Reports
Current Biography
National Journal
National Review
New York
New Yorker
Newsweek
Saturday Review
Sports Illustrated
Time
US News and World Report
Variety
Washington Monthly

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Material from the newspapers and magazines listed above is processed according to priorities established in consultation with our customers. Top priority is currently being given to The New York Times, The Wall Street Journal, The Washington Post, Business Week and The Financial Times (London).

Selection Criteria

Attachment 1

4) Legi-slate is a computerized bill and vote tracking system (see attachment 4).

5) Our in-house computer tracks all substantive House and Senate floor votes by issue, i.e., defense, taxes or any other specific issues. House votes date back to 1977 and Senate votes date back to 1974 (see attachment 5).

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National Committee

Michael E. Deaver
Director of Public Affairs

021000

July 1, 1980

M E M O R A N D U M

TO: Drew Lewis
Fred Biebel
Dr. Richard B. Wirthlin

FROM: Anne Fleig

RE: Computer Capabilities

The RNC currently subscribes to four computer systems out-of-house (KIT, NYTIB, AP Political Databank, Legi-slate) and one in-house. Following is a brief description of their capabilities:

1) The New York Times Information Bank provides detailed, informative abstracts of newspaper and magazine articles relating to hundreds of different subjects. The data base contains all the news and editorial material from The New York Times and partial material from 70 other publications (see attachment 1).

2) The Key Issue Tracking System is a constantly updated data base that allows users to monitor current issues on a continuing basis. Over 200 key issues, 350 individual names and 250 organization names are currently stored in the KIT data base. Data base sources: The New York Times, Associated Press Washington, Newsweek, and over 50 other major publications (see attachment 2).

3) The Associated Press Political Databank is a constantly updated electronic library tracking the 1980 campaign year. It examines the issues and the candidates for the Presidency and for statewide offices(see attachment 3).

Republican
National
Committee

Ron Charnock
Director
Computer Services Division

C005003

8304042031 1

MEMO TO: Bay Buchanan

FROM: Ron Charnock

DATE: July 21, 1980

RE: Reagan for President Computerized Political Accounting (CPA) Status Report

I've prepared a status report for your review based on discussions this morning with Amy Gilbert, Ted Wroblicky, Marcus Heth, John O'Leary, John Hunnicutt of TCI and Digital Equipment support personnel. You'll pardon me if I sometimes move outside the areas of direct computer support. In no way am I trying to point blame or assign responsibilities; I'm simply trying anything that I can, from my limited perspective, to identify potential problems or stumbling blocks in all areas of the Reagan for President accounting operation.

I trust that this document can be the basis for our discussion on Wednesday morning.

RC:fb

Republican
National
Committee

Ron Charnock
Director
Computer Services

June 9, 1980

8304042031 2

Mr. William Timmons
1850 K Street, N.W.
Suite 850
Washington, D.C. 20006

Dear Bill:

Enclosed are two books that should be of assistance in the Reagan for President targeting efforts.

The first book is the information you requested last week. Included are two reports that detail expected 1980 state-by-state Presidential turnout and the two biggest statewide Republican vote getters since 1972 by percent and by Republican vote. The book also contains 51 graphics, illustrating the trend line of total Presidential turnout since 1944 for each state and the country as a whole.

Since you might not be familiar with our turnout analysis algorithm, let me bore you with some detail.

Trend analysis is perhaps the most valuable statistical routine for making forecasts using time series data. It focuses on calculating a line that best fits a series of points over time and then extending that line to the next point in time. However, some statistical problems do occur with this method. The forecast must deal with events in the future, using the past elections as a guide. There are no assurances that the future influences on the time series will operate like those in the past. Consequently, we are unable to put limits on the degree of accuracy of our forecast, unlike survey research.

The initial step in trend analysis is to plot the points on a graph as illustrated by the enclosed charts. The next step is to judge whether the shape of the trend is a line or a curve, since each has its own formula for plotting

C00250

future points. There are no concrete rules to tell us which shape the line is. Since this is such a subjective evaluation, the RNC trend model calculates both a linear trend statistic and an exponential (curved) statistic and averages the two statistics for the final calculation of turnout. We like to think of these two calculations as the minimum and maximum turnout.

The second book explains our CAMPS (Campaign Analysis, Management and Planning System) model. It is county based, and I believe it's probably the next level we should use for Reagan targeting.

I'd be happy to answer any questions you might have and I look forward to working with you further on this project.

Best regards,

Ron Charnock

RC:fb

CC: Bill Brock

BCC: Ben Cotten

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bership Office
ce Division

Presidential

001000

July 7, 1980

MEMORANDUM

TO: Bill Rutherford - CCA
FROM: Phil Smith
RE: Reagan Contributor File

I am sending you a copy of the Reagan Contributor File on magnetic tape, along with a tape dump and record layout. This file copy will be maintained by CCA and shall be considered the exclusive property of the RNC.

Any use of this file must be authorized in writing by the following RNC staff members: Jack Faris, Leah Charnock, and Phil Smith.

/an

cc: Jack Faris
Leah Charnock
Steve Fisher - CCA

8304042031

Republican
National
Committee

Membership Office
Finance Division

C00195

MEMORANDUM

Presidential

TO: BILL RUTHERFORD

FROM: LEAH CHARNOCK

DATE: JULY 8, 1980

RE: REAGAN TAPE

Please consider this as authorization for Ed DeBolt to have access to the Reagan contributor file for purposes of the Reagan compliance mailing.

cc: Jack Faris
Phil Smith

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REPUBLICAN GOVERNORS ASSOCIATION

310 First Street, S.E.,
Washington, D.C. 20003

all governors

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McLEAN, VA. 22102

4-020414S161002 06/09/80 ICS IPMMTZZ CSP WSHB
1 2024846620 MGM TDMT WASHINGTON DC 06-09 1052A EST

REPUBLICAN GOVERNOR'S ASSN P VON BORSIG
310 1ST ST SOUTHEAST
WASHINGTON DC 20003

THIS MAILGRAM IS A CONFIRMATION COPY OF THE FOLLOWING MESSAGE:

2024846620 TDMT WASHINGTON DC 360 06-09 1052A EST

8304042031 8

RECENTLY I EXTENDED AN INVITATION TO GOVERNOR REAGAN TO MEET WITH THE REPUBLICAN GOVERNORS ASSOCIATION. OUR INVITATION HAS BEEN ACCEPTED.

THE MEETING IS SCHEDULED TO BE HELD ON JUNE 20 AT THE PALMER HOUSE IN CHICAGO FROM 12:30 TO 2:30 P.M. IT WILL BE A WORKING LUNCHEON MEETING.

AT THE MEETING WE WANT TO PROVIDE GOVERNOR REAGAN WITH OUR IDEAS ON FORMULATION AND DEVELOPMENT OF POLICIES AND ISSUES OF THE CAMPAIGN, OF DOMESTIC POLICY DURING A REAGAN ADMINISTRATION, INCLUDING OUR IDEAS ON FORGING NEW FEDERAL/STATE RELATIONSHIPS, AND TO DISCUSS OTHER MATTERS OF MUTUAL INTEREST WHICH MIGHT ARISE.

YOU WILL BE CONTACTED VERY SOON BY THE RGA STAFF FOR YOUR SUGGESTIONS AS TO SPECIFIC AGENDA ITEMS. I WOULD APPRECIATE YOUR GIVING THIS MATTER YOUR MOST CAREFUL AND THOUGHTFUL CONSIDERATION SO THAT AN AGENDA CAN BE WORKED OUT WELL IN ADVANCE OF OUR MEETING.

THE MEETING WILL BE CLOSED TO THE PRESS BUT THERE WILL BE A PHOTO SESSION IMMEDIATELY PRIOR. FOR YOUR INFORMATION, AN ANNOUNCEMENT WILL BE MADE TO THE PRESS SOON INDICATING OUR MEETING WILL TAKE PLACE. I WANTED YOU TO HAVE THIS INVITATION IN ADVANCE OF THE ACTUAL RELEASE, OF COURSE.

THERE WILL BE A PRESS CONFERENCE AT THE CONCLUSION OF OUR MEETING.

THIS IS AN EXTREMELY IMPORTANT SESSION FOR BOTH GOVERNOR REAGAN AND THE REPUBLICAN GOVERNORS ASSOCIATION, SO I AM HOPEFUL YOU CAN ADJUST YOUR SCHEDULE IN ORDER TO ATTEND. I CAN ASSURE YOU THAT THE MEETING WILL BE SUBSTANTIVE AND PRODUCTIVE.

PLEASE CONTACT OUR RGA OFFICE AT YOUR VERY EARLIEST CONVENIENCE INDICATING WHETHER YOU WILL ATTEND.

Mailgram

REPUBLICAN GOVERNORS ARE COMMITTED TO HELPING BUILD A STRONGER AND MORE UNIFIED PARTY. GOVERNOR REAGAN IS EQUALLY COMMITTED AND DEDICATED TO SEEING THAT THIS HAPPENS. OUR MEETING IN CHICAGO ON JUNE 20 WILL CONTRIBUTE MUCH TO INSURING A STRONG UNIFIED EFFORT THIS FALL AND SUBSEQUENTLY IN THE REAGAN ADMINISTRATION.

I LOOK FORWARD TO SEEING YOU IN CHICAGO. ON THAT SAME AFTERNOON FROM 4:30 TO 6 P.M. GOVERNOR REAGAN AND FORMER GOP CANDIDATES SEEKING THE PRESIDENTIAL NOMINATION WILL BE ATTENDING A UNITY RECEPTION AT THE PALMER HOUSE. IF YOUR TRAVEL SCHEDULE PERMITS YOU ARE INVITED TO ATTEND THIS EVENT.

SINCERELY
RICHARD A SNELLING- CHAIRMAN RGA

10:53 EST

MGMCOMP MGM

8304042031 9

DRAFT STATEMENT

All Americans should be outraged at President Carter's latest chapter in his campaign of fear. We have already heard a note of desperation in his campaign, now we hear a whole symphony.

President Carter said yesterday that Governor Reagan would pit white against black, Jew against Christian and North against South. This is beyond slander. It is among the saddest moments in the history of American politics. It is the rhetoric of racism, bigotry and division. He demeans the office he holds.

In a time when our national well-being is threatened at home and abroad, a time of international crisis, Mr. Carter slanders while our nation cries out for leadership. Governor Reagan put it eloquently when he said we must pull the country together, not tear it apart. It is clearer now than ever that we need the leadership of Governor Reagan, a statesman, not a politician in the White House.

I urge Mr. Carter to rethink these irresponsible remarks. I call on him to apologize to the American people. Our task is to heal the wounds of era's long past, not to reopen them for sorry, political gain.

Talking points:
mean spirited
divisive
strident
lack of integrity

8304042032C

Republican
National
Committee

MEMORANDUM

To : Ed Diebolt
Ben Cotten

From: Dennis Whitfield

Date: June 9, 1980

Re : "COMMITMENT'80"

With the assistance of Nick Longworth and Joe Gaylord, we have completed the following outline of how we view the development of the "Commitment '80" program. I felt it was appropriate to leave the intricate details of this program until the conclusion of the meeting to be held on the West Coast for the Reagan Campaign Committee.

Following that meeting and sign-off on the program, I will develop a day-to-day timeline for each of the major project areas and a detailed budget analysis.

DW/ah
attachment

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WHAT IS COMMITMENT '80?

Commitment '80 is the largest single volunteer effort ever developed by a political candidate or campaign. This program designed specifically for the 1980 election cylce, will ultimately involve hundreds of thousands of people who are committed to bring about significant political, social and economic changes in our country. People just like you who are willing to go door to door, community to community and ask others to join in the move towards positive leadership from the Presidency to the courthouses of America.

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COMMITMENT '80 WILL TAKE PLACE IN SEVERAL STAGES

I. July 19-20--Announcement of program at the post convention meeting of Party officials and Reagan and RNC political operations by Governor Reagan and Chairman Brock.

II. August 11--Delivery of "Commitment '80" manuals to party and key county leadership.

III. September 6--"Call for the Order," 175,000 to 200,000 volunteers meet in 135-150 locations throughout the country to hear Governor Reagan and Chairman Brock talk about "Commitment '80."

During the gathering the volunteers will also hear "Commitment '80" Program Coordinators discuss in detail the concept, format and timeline for implementing the program.

IV. October 4--"Commitment Day," hundreds of thousands of volunteers meet at local offices which have been established in homes, offices and garages throughout the country to pick up their packets and materials for carrying "Commitment '80" to millions of households in America. Commitment Day will kick off Commitment Week, actually 10 days, or until October 14. At that time

all recorded contacts are returned to local headquarters and prepared for use in the turnout operations.

OBJECTIVE

The objective of "Commitment '80" is voter contact. Therefore, in the "Commitment '80" manuals, detailed attention must be given to the purpose of the voter contact to be conducted in each state and locale.

1. Voter Advocacy
2. Voter Identification
3. Voter Turnout

Once the purpose of voter contact has been identified, we must decide on the best method or tactics to conduct that particular contact program.

DOOR TO DOOR--Obviously the best and most persuasive method is someone going door to door in their neighborhoods. One on one contact is the strongest tactic for delivering a political message and recruiting others to help.

DIRECT MAIL--This tactic can be used effectively to motivate those who are already favorably disposed towards a candidate and for voter contact for a specific function at a fairly low cost.

TELEPHONES--In the absence of adequate volunteers, but desiring personal contact, telephones become the most time efficient and best controlled method of voter contact.

NOTE: Whether we use door to door, direct mail or telephones, good lists are an absolute necessity. List preparation must start at once lest time restraints kill the program.

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Working with this massive number of volunteers requires a strong management system with two necessary requirements: strong regional coordinators, and a very good communication system. Information must flow to and from the national office in a clear, consice and unencumbered manner. With this in mind, an organizational chart and description of personnel is attached. (Attachment 1 and Attachment 2) Basically the levels of structure are: national, regional and state.

A. The function of the national office is to develop and convey policy to the regional coordinators and also be a service arm of the operation.

B. Regional--to coordinate and implement the program in ten (10) states within the region; to provide information necessary for the national office to make decisions and policy changes; to file weekly reports to the national office; and service to the state operations.

C. State--to implement to program in the state--provide feedback and reports to the Regional Coordinators.

MATERIALS

(Attachment 3)

TIMELINE

(Attachment 4)

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PERSONNEL

Program Director

Will be responsible for overall management of the program, budget and monitoring program status.

Will coordinate policy established by Reagan campaign and RNC.

Will select Regional Coordinators.

Will be housed in the Washington office with a staff of three to four people.

Regional Coordinator

Will coordinate ten state's activities and assure that volunteers are in place for program implementation, monitor material distribution and be responsible for maintaining regional status reports.

Will select or recommend to the Program Director, on the input from the Reagan field people and State Party officials, the State Chairperson and State Director for the program.

Should have a staff of two field people, one secretary and volunteers, and will work out of a local office within their region.

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State Chairman

A volunteer who is able to lend credibility to the effort and attract others.

State Coordinator

This position should be a paid position but could be a volunteer if the right location and State Chairman are in place.

Some Other Thoughts

The entire program management and staff at all levels must confine its activities to the volunteer effort.

Input for selection of personnel at the state level and other decisions at

"COMMITMENT '80" MANAGEMENT

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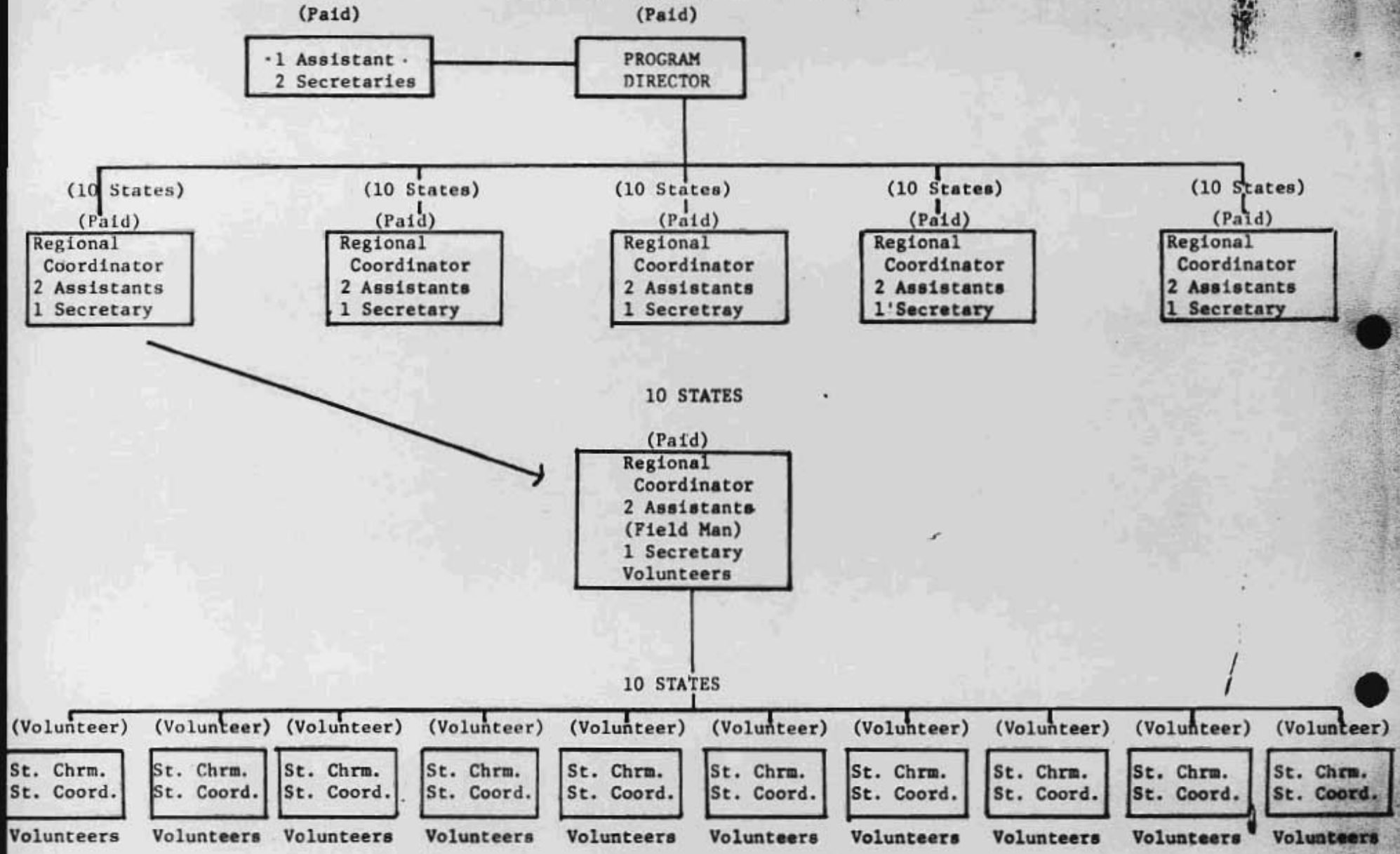

Attachment

the regional level will be made with input from the Reagan field staff.

The program will work if the regular Reagan organization in the states and the State Party officials understand that this program is directed at a massive volunteer effort only.

The decision on where to mount blitz efforts, voter ID, and election day activities (furnishing phoners or precinct workers) must be the call of regular Reagan organization leaders or field staff in conjunction with State Party officials.

Coordination with other campaigns on election day turnout is the responsibility of the regular Reagan organization.

One of the goals should be to put at least one person in every precinct (175,000) on election day. Some precincts will need more people.

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Time Line

June 23--Have Program Director on board with office and staff.

June 30--Complete Reagan associates plan for sign-off by Reagan Committee and RNC. Commitment on budget.

July 10--Select Regional Coordinators

July 12--Train Regional Coordinators

July 18 or 19--Present plan and Regional Coordinator at Detroit meeting.

July 21--Regional Coordinators on location to implement the plan.

Weekly status reports from the field to the Program Director are a must.

MATERIALS

By Convention

1. Program Explanation
2. Selling slide show
3. Manual for program
4. Time Line
5. Promotional signs
6. Material design sample
7. Flip Chart:
   - structure
   - budget
   - allocation
   - legal
   - responsibilities

For September 6

1. Promotion ads
   - locations
   - velox prints
   - radio tapes
   - campaign promo materials
2. Sign up material
   - commitment cards
3. Slide Shows
   - shipping boxes
4. Kickoff speeches
5. Electronic materials
6. Video cassettes
7. Sample kits

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For October 4

1. Kits

   Outside cover folder

   Instruction sheets

   Conversations

   3-part NCR canvass forms

   Computer printouts if used

   Brochures

   "Sorry I Missed You" door hangers

   Cardboards

   Pencils

   Absentee ballot information

   Registration information if applicable (Iowa)

   Maps with written description of the territory

   BRE

   Buttons

   Name Badges

   Number goals

2. Kick off facility for Blitz

   Tables

   Chairs

   Kits

   Refreshments

For Election Day

1. Kits with walk lists
2. Telephone numbers

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Attachment 5

BUDGET (Five Months)

I.	NATIONAL HEADQUARTERS		
	Director	18,750	
	Deputy Director	10,000	
	Secretaries (2)	10,000	
	Office Operations	15,000	
	Expenses (Director)	17,500	
		71,250	71,250
II.	REGIONAL OFFICE		
	Coordinator	16,665	
	Field Staff (2)	20,000	
	Secretary	5,000	
	Expenses (Field Assistants)	35,000	
	Office Operations	15,000	
	Expenses (Coordinator)	12,500	
		104,165 x 5	520,825
III.	This budget does not take into account the potential need for a paid coordinator in 10-12 key states where implementation of the program is critical to the success of the election. Should this become necessary additional expenses will be:		
	State Coordinator	10,000	
	Office Expenses	7,500	
	Travel Expenses	5,000	
		22,500 x 12	270,000
			$862,075

* THIS BUDGET DOES NOT INCLUDE ESTIMATE OF COST FOR GRAPHIC DESIGN, LAYOUT, PRINTING AND DISTRIBUTION OF MATERIALS.

8304042033O

Reagan & Bush

Reagan Bush Committee

901 South Highland Street, Arlington, Virginia 22204 (703) 685-3400

September 5, 1980

Drew,

Here are your remarks as scripted and approved by this office.

Please call with your comments. As you know, Noel Koch wrote the material.

His #s: 393-2111 (O)
299-7297 (H)

Regards,

Bill Carruthers

8304042033 1

Published by Reagan-Bush Committee, United States Senator Paul Laxalt, Chairman, Ray Burkhalter, Treasurer

30404203

Drew Lewis Opening

Good Morning.

I want to welcome you to this very significant and rather unusual meeting. A number of your friends and colleagues are here with me today, and we will be discussing what is surely the most ambitious voluntary political effort ever undertaken in American politics.

We have a lot of ground to cover and I want to move very quickly into it. But I do want to preface this occasion with a single brief observation.

There is a very strong feeling in the country today that somehow America has gotten away from us, that things are out of control and we as a people are no longer in charge of our own lives or the course of our country.

This is not a partisan perception. It is widely shared, and the events at the Democratic Convention in New York were only a microcosmic confirmation of that fact.

Now we as a people are either going to shape our own destiny, or we are going to have some destiny not of our own choosing inflicted upon us. There is not third alternative. Jimmy Carter has said that what Americans do this year will determine our course for the rest of this century, and he is absolutely right. My concern is not for what we do, but for what we neglect to do.

America needs leadership, and there is only one candidate who can provide it. John Anderson is irrelevant, and Jimmy Carter is demonstrably a failure. Ronald Reagan is a leader. It's that simple.

But of course, nothing is ever really that simple.

We can't buy this election, we can't steal it, and we're not going to have it handed to us. We have to work for it. That is Governor Reagan's assessment of it, and it is mine. This assessment is at the heart of Commitment'80.

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NOW I WISH TO GO FIRST TO THE REAGAN-BUSH CAMPAIGN DIRECTOR, WILLIAM CASEY.

QUESTION TO CASEY.

BILL, ALONG WITH GOVERNOR REAGAN, YOU'VE BEEN A PRIME MOVER IN COMMITMENT '80. NOBODY BEFORE HAS EVER FIGURED OUT TO MARRY ADVANCED COMMUNICATIONS TECHNOLOGY WITH GRASS-ROOTS POLITICKING. GIVE US SOME IDEA OF THE THINKING BEHIND THIS, AND WHAT YOU SEE AS THE PROSPECT FOR THE FUTURE. ARE WE PRESENT AT THE CREATION OF A NEW ADVANCE IN POLITICS?

THANK YOU, BILL.

ANDY CARTER IS THE NATIONAL DIRECTOR FOR COMMITMENT '80.

ANDY, GIVE US A SENSE OF WHAT WILL ACTUALLY HAPPEN IN THE FIELD, WHAT CAN OUR PEOPLE AT THE LOCAL LEVEL EXPECT FROM YOUR FIELD MEN?

THANKS, ANDY.

DENNIS WHITFIELD IS THE DIRECTOR OF SPECIAL PROJECTS AT THE REPUBLICAN NATIONAL COMMITTEE. HE HAS BEEN IN CHARGE OF PREPARING THE HOUSE PARTY KITS AND OTHER MATERIALS FOR YOU ON SEPTEMBER 13. DENNIS TELL US SOMETHING ABOUT THESE MATERIALS. HOW DO WE USE THEM?

GOOD, THANKS, DENNIS.

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Drew Lewis Lead-In to Cassette

Now that we have a better understanding of the overall objectives and the potential for Commitment '80, let's take a look at a film we've put together to help flesh out the details for implementing this effort. At the conclusion of the film, Governor Reagan will be here so that he can give you his own views of the importance of volunteers such as yourselves and those you'll be recruiting in the coming week and beyond to October 4.

Drew Lewis Closing

(Concludes)

Thank you , Governor. We have listened to Governor Reagan here today, and remember that he'll be speaking to you and your friends next Saturday on CBS as you gather in your homes all across the country to join us in this great commitment.

Be sure to check your local TV listings for the time of the broadcast in your area. We look forward to seeing you there.

Thank you.

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the DCM GROUP

A unit of ESD AND COMPANY, INC.

August 28, 1980

MEMORANDUM TO: Peter Dailey

FROM: Ed DeBolt

8304042037

Per our earlier discussion, the following is the suggested format for the Saturday, September 6th, 1:00-2:00 p.m. live satellite broadcast from WETA Studios in Arlington, Virginia.

1:00 Opens with Drew Lewis as moderator - gives greeting, sets stage for the hour, recognizes the number of meetings and thousands of volunteers, mentions some of bigger events.

1:05 Lewis gives brief intro of Betty Heitman, Co-Chairman of RNC. Heitman discusses importance of volunteer's role, Federation of Republican Women's importance and dynamics of COMMITMENT '80.

1:08 Lewis gives brief intro of Dr. Richard Wirthlin. Wirthlin presents latest favorable poll results, importance of peer pressure, person-to-person contact in helping voters make up their minds.

1:14 Lewis gives brief intro into cassette and its content.

1:16 Cassette

1:45 Following cassette, Lewis gives intro of Bill Casey (could add Ed Meese, as well) and Governor Reagan. Casey asks 5-6 prearranged questions which lead the Governor into 1-2 minute answers about the importance of volunteerism, strengthening the Party at all levels, country can't stand four more years of Carter, I need more Republicans at all levels to help me, etc., etc.

1:54 Lewis gives brief intro of Chairman Paul Laxalt. Laxalt's presentation exorts audience -- "59 days of hard work to save America," etc.

1:58 Lewis summarizes COMMITMENT '80, its goals and importance, thanks participants and closes the broadcast.

2:00 Off the air

1515 North Court House Road, Suite 301, Arlington, Virginia 22201 / 703-524-7477

881000

Peter, my office will start tomorrow morning to work up individual scripts or script outlines for all the participants in the program.

Earlier today, Hugh Branson and I met for several hours and agreed on the format and thrust of each participant in the September 13th, half-hour broadcast. Hugh will be getting that to you this afternoon.

cc: Bill Casey
Drew Lewis
Dennis Whitfield
Bill Carruthers
Hugh Branson

8304042033e

Republican
National
Committee

Ron Charnock
Director
Computer Services

8304042039

MEMO TO: Bay Buchanan

FROM: Ron Charnock

DATE: June 10, 1980

RE: Computer System for the General Ledger

In response to your memo to Bill Casey, let me advise you of the steps we've taken to assure meeting our committments to the Reagan for President Treasurer's Office.

As of last Monday, Marcus and his staff have been placed on 72 hour work weeks. As a result, we are guaranteed of having over one man-year of time available for programming, system development and documentation between June 2nd and July 7th. Marcus estimates that the RFP conversion, based on the requirements as we know them today, should take 400 man-hours. This represents about 25% of the available time, without any TCI personnel time included. While I cannot guarantee that Marcus will spend 100% of his time on your project for the next 50 days, I can guarantee that your project receives top priority when it comes to any resource allocation decisions, particularly as these decisions affect Marcus and his staff.

As a further safeguard, we will have two TCI experts working with Marcus for the week of June 10th. One individual is an installation advisor and the other is the chief programmer for TCI. At the end of the week, Marcus and I, in consultation with the TCI people, will determine what additional TCI support, if any, is required to meet our time frames.

I hope these steps are sufficient to satisfy your concerns. You can be sure that we do recognize the urgency of this project and I hope you continue to feel that we are as obliging as we were the week of your visit. I'm confident that the Computer Services staff will deliver an accounting system that will meet your requirements by the first week in July.

cc: Bill Brock
Bill Casey

TO: BILL CASEY

FROM: BAY BUCHANAN

DATE: 6/2/80

RE: COMPUTER SYSTEM FOR THE GENERAL

After analyzing RFP's computer needs for the general, I have requested that Ted Wroblicky and RNC computer staff work together to implement the following systems: (listed in order of importance)

1. General ledger system, with FEC reporting capability.

2. Accounts payable system to be integrated with the general ledger system.

3. Accounts receivable system - separate from the general ledger with the capability of billing.

Both (1) and (2) are expected in operation July 7, 1980; accounts receivable should be ready August 1, 1980. Ron Charnock and Marcus Heth have both assured me that the general ledger/accounts payable system will be fully operational by July 7, 1980.

There will be NO accrued commitment system. If a commitment is well defined it will be treated as an accounts payable. All other commitments (e.g. estimated rally costs of $15,000) will be tallied manually and monitored daily. This method was chosen to insure up-to-date daily expenditure reports as well as accurate computerized information.

Ted Wroblicky has expressed concern over the tight schedule. The following steps will be taken to reduce the danger of a schedule delay:

1. Request Ron Charnock to allow Marcus Heth to work 100% on this project for the next 50 days.

2. Request TCI to send 2 computer experts, familiar with the system, to RNC to aid Marcus in the next few weeks.

If Ron is in a postion to agree to these suggestions, the deadline should be met.

The RNC was very obliging this past week, and I feel certain they recognize the urgency of the matter, and will do whatever possible to see that the system is up and running by the convention.

BB: jb

cc: Bill Brock

cc: Ron Charnock

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Republican
National
Committee
Ron Charnock
Director
Computer Services

6/8

Bay Buchanan

Please let me know
if you have any
questions

Ron

Republican National Committee.
310 First Street Southeast, Washington, D.C. 20003.

MEMO TO: To

FROM:

DATE:

RE: Final Investigation Report On The Design Of The Payroll System Interface

Marcus Heth

This is to inform you that we have completed our final investigation on the design of the Payroll System Interface. The attached report illustrates and describes the interface's design specifications. It contains the following items.

1. A statement of the system's purpose, and a description of its functions.
2. Flowcharts depicting the flow of the system's logic.
3. A description of the dictionaries governing the files connected to the interface.
4. Report layouts showing the design and content of each report.
5. An explanation of the system's security and control procedures.
6. A statement delineating the cost of the system.

If you have any questions relating to the design of the Payroll System Interface, please don't hesitate to contact us.

cc: Ron Charnock

8304042034 2

Republican
National
Committee

Ron

0052T0

MEMO TO: Ted Wroblicky

FROM: Ron Charnock

RE: DEC Remote High Speed Printer

DATE: June 4, 1980

We've received the information on the LRP 20 from Digital. The LRP 20 is a 300 line per minute printer that is either syncronous or asyncronous. The cost of the printer is $28,400 with a 64 character font. The 96 character font is $29,400. Digital has given us a tentative delivery date of September, 1980. If we firm up a committment with Digital for the printer they will attempt to move the delivery date up as much as possible.

It is my belief that the RFP Committee does not need this printer and that the lower speed printers should meet your needs. We would be happy to institute courier service from the RNC to the RFP Headquarters on a regular basis, and to give high priority to your large print jobs on the RNC's 1500 line per minute printer.

If you wish us to continue researching the LRP 20, please let me know.

cc: Bay Buchanan
Arlene Triplett

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Republican
National
Committee

Ron Charnock
Director
Computer Services

MEMO TO: Ted Wroblicky

FROM: Ron Charnock

DATE: June 2, 1980

RE: Response to your June 1 Memo

There are several points that you made in the June 1 memo that I'd like to comment on.

First, it is my understanding that your responsibilities on the RFP Accounting implementation are limited to user training, user procedure development and coordination with RFP personnel. It is not your responsibility for overall coordination of this project. That responsibility lies with the division director, not a staff employee. I'm not sure what you mean by responsibility for data file integration; however, I do expect you to coordinate with the RFP Treasurer's Office the initial information required for their chart of accounts, FOC accounts, trial balance and budget information.

Secondly, I've outlined the project organization chart as I intend to run this project. Since we cannot count on TCI support at this time, I refuse to include them in the chart. Furthermore, should any TCI technical personnel be available to use, I will insist they report to Marcus Heth. I will not approve any organization chart that removes from Marcus responsibility for the entire project.

We have prepared time and manpower estimate and they will be forwarded to you today.

8304042034

Ted Wroblicky
June 2, 1980
June 2, 1980

The Accounts Payable problem you refer to has been resolved and both the A/P and General Ledger packages have been compiled and the demonstration streams have been completed.

The Payroll modification will be completed by June 6, 1980.

Should you have any questions, please give me a call.

RC:fb

CC: Bay Buchanan
Arlene Triplett

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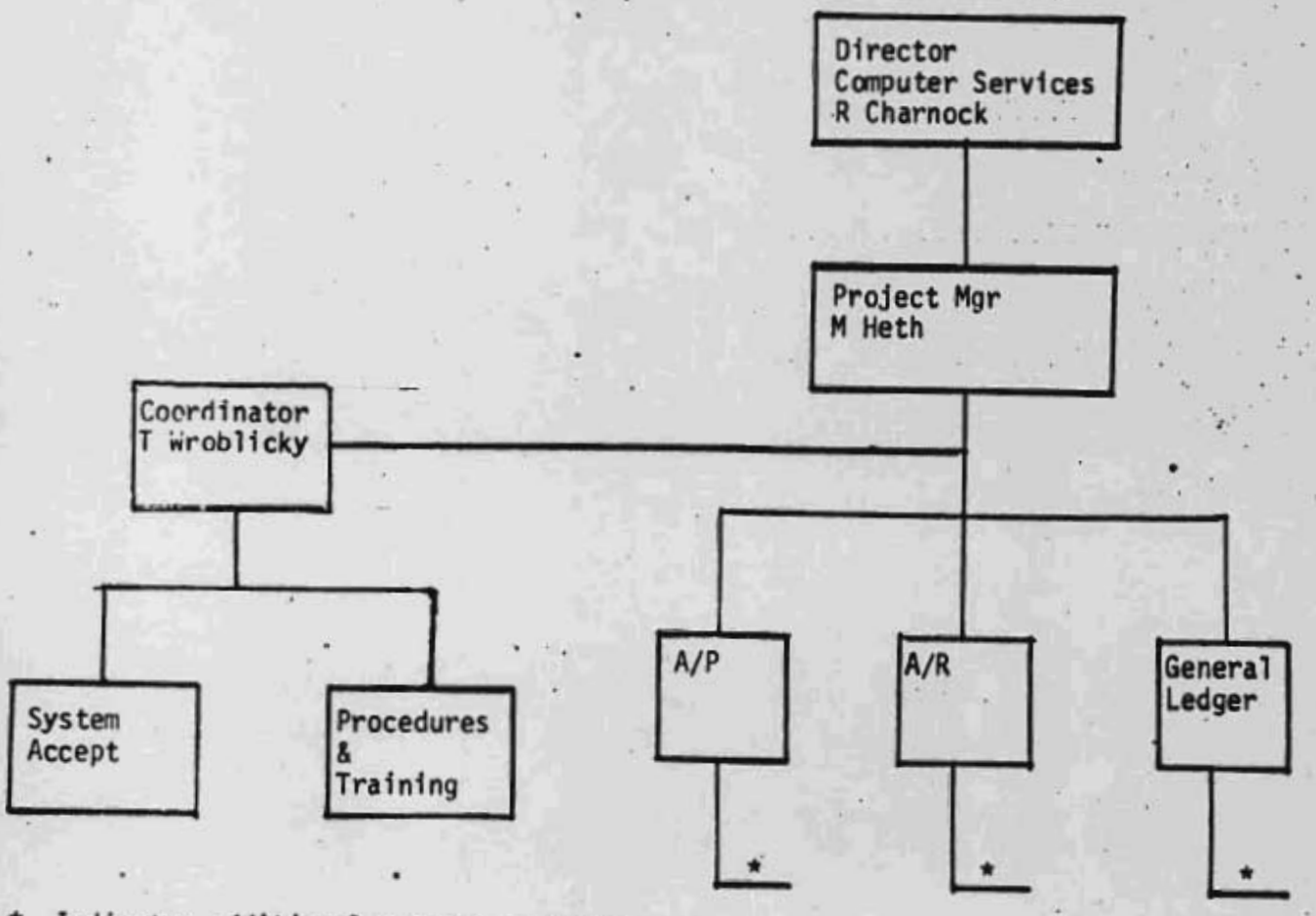
8 3 0 4 0 4 2 0 3 4 8

RFP ACCOUNTING SYSTEM

PROJECT ORGANIZATION CHART



* Indicates additional support personnel

Republican
National
Committee

MEMO TO: Ron Charnock

FROM: Marcus Heth MH.

RE: Memo from T. P. Wroblicky

DATE: June 2, 1980 - 10:00 a.m.

Ron,

As you can imagine I have several problems with Mr. Wroblicky's memo of June 1. First of all, TCI will be unable to supply us with any substantial long term personnel support. I have talked with John Hunnicutt, the vice-president of TCI, and he cannot spare any personnel for an extended period of time. I am working on an arrangement with them which may get us a couple of days of full time support but this is very tenuous at this point. Please understand though, that TCI is willing to help us as much as possible over the phone. John has assured me that whenever I have any questions that their top analyst is at my disposal. Mr. Wroblicky has suggested that his organization apply some pressure to TCI. I am very much against this. We have established a very good relationship with TCI, a relationship that must continue for many years to come. I don't believe it is in the interest of the RNC or the RFP Committee that this relationship be jeopardized. Knowing the type of company TCI is and its company executives, I don't believe it is ealily susceptible to political pressure.

Since I don't believe that we will have full time support from TCI, and for other reasons you and I have discussed, I suggest that my staff and I be responsible for the installation of the accounts receivables package if the RFP decides to buy it. We are going through installation with two other packages and are familiar with the techniques required for installation. As you, Mr. Wroblicky, and I have discussed, there is no need to try to have the A/R package up and running in the first week of July since receivables will not be coming in until mid-August. I believe that we can install the A/R system late in July and have it operational by the beginning of August.

Mr. Wroblicky has provided us with some functional specifications for the payroll system interface. Although the purpose he provided us with is accurate, I don't believe the specifications he provided will give us the correct end result. Because of the Microdata

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architecture, the allocation table format will be of variable length and will be more of a translation file than table. Also, adding to the allocation table will be on-line, real-time through CRT terminals. We will use his coding forms as source documents. The conversion program specifications he has provided us are correct in theory but the end result is incorrect. The needed end result is a group of GL transactions that contain summary information on salary, benefit, and taxable amounts. There is no need for a tie back between these transactions and an employee payroll record. We are proceeding with our design and development here and I believe that this payroll interface will be completed by June 6, 1980. We of course will provide GL transactions and payroll allocation translation file reports.

Mr. Wroblicky makes reference to time estimates and a development schedule which I was to have completed and sent to him today. As you know I have considerable problems with the organization chart contained in his June 1st memo. I have completed development and time estimates but they rely on a very different organizational chart. I don't believe I can finalize my estimates until the organization chart is finalized. Only at that point can I be sure of the personnel involved in this project and therefore accurately estimate the times to complete it.

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8304042034 9

June 1, 1980

To: Mr. Ron Charnock

From: T. P. Wroblicky TPW

Re: Your two memos of 5-30-80 regarding training and accounting computer system requirements.

A firm assignment of responsibility regarding systems development, programming, implementation testing and training should result from the schedule and project organization which should be developed next week. Development of that schedule and organization are dependent upon the staffing/time estimates to be completed by Mr. Heth on Monday and RNC's ability to acquire substantial support from TCI.

I telephoned three of the four TCI users on the list you provided me. Each of them strongly advised full-time support from TCI to implement just one application within a two month period. Because we are attempting to implement three applications, with considerable modifications, I believe we should obtain two expert applications programming personnel from TCI. One should be responsible for Accounts Payable (A/P) Implementation. The other person should be responsible for Accounts Receivable (A/R) implementation assuming the A/R system is operable and sufficiently free of bugs. Mr. Heth should continue to be responsible for General Ledger system implementation. The specifics of modification responsibility can be established when available personnel resources are known and the schedule developed. At that time, the specific chart of accounts, report forms, trial balance needs can be established and scheduled more accurately. At this time, barring no unforeseen staffing problems, I expect to be responsible for training, data file initialization, user procedure development, system acceptance testing, and overall coordination.

It is my understanding based on conversations with Mr. Heth and you that the account code structure has three levels represented thusly XXX/XXX/XXXXX. This three level FOC account code structure appears to be suitable. However, I prefer to "walk" it through the chart of accounts to validate its suitability. At this point, we must make it work because of the inflexibility of the General Ledger package. We simply do not have a choice if we are to use the package. We will forward a sample trial balance as soon as possible which should be by June 6 if that in fact is the date required by the schedule which is to be developed next week.

I will be in Sacramento the week of June 2nd and can be reached at the

Home (916) 488-0632
Office (916) 443-6756

I plan to return to Washington June 10.

Please send the time estimates to my Secretary, Mrs. Amy Fudge, when you have them prepared. They can be sent via QWIP/Xerox 1200 compatibility.

I plan to contact Mr. Klein of TCI regarding the Accounts Receivable system. I'll be in touch with you to discuss what I learn.

We have not had the opportunity to discuss in-depth a possible project organization. However, I have taken the liberty of developing a tentative project organization chart, a copy of which is attached. It calls for two expert programmer analysts from TCI. Because we do not have a detail schedule developed as of date, please proceed with the following tasks, most of which have been discussed with you and Mr. Heth.

1. Pursue obtaining two people from TCI for the duration of the project. They should be expert in Accounts Payable, Accounts Receivable and General Ledger applications packages.

2. As we discussed in our meeting, please prepare person hour time estimates for:
   - Preparation of necessary design and program specifications
   - Obtaining program compilation free of fatal diagnostic errors
   - Unit tests of each program
   - Developing a comprehensive test
   - Performing the comprehensive test

   Estimates should be provided for the following applications and application modifications:

   - General Ledger
     - Budget performance reports should be prepared per the samples from the Microdata system
     - FEC reports modifications(if required) per samples from the Microdata system
     - Other reports as included in the standard TCI package

   - Accounts Payable
     - FEC reports per samples from the Microdata system
     - Check reconciliation module

   - Payroll
     - See functional specifications for Microdata/DEC-TCI file translation

   - Accounts Receivable
     - As developed by TCI

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3. Obtain vendor lists from DEC and DEC's preferred manner of handling the remote high speed printer (approx. 300 lpm) requirements as we discussed previously.

4. Resolve Accounts Payable problem between TCI application software and DEC control software.

5. Bring up General Ledger and Accounts Payable packages using TCI provided "compile and demonstration streams."
   - Save complete working copy of each package prior to beginning package modification

6. Begin General Ledger modifications. Priority should be given to the Budget Performance report. If modifications are required to produce FEC reports, it should receive secondary priority.

7. Begin Payroll modificatios per attached functional specification.

The above approach has been reviewed with Ms. Bay Buchanan and has her concurrence. Should you have any questions, please do not hesitate to call.

Copy to: Ms.Bay Buchanan
Ms.Arlene Triplett

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5-30-80

Payroll System Interface

Purpose: Convert the payroll account distribution as applied by the Microdata Computer to the format required by the DEC/TCI General Ledger system. Because the Microdata system can only distribute each employee's pay to one account, it will be necessary to provide an allocation table which will contain the identification of the accounts to receive the allocations and the percent amounts of employee pay to be allocated to each account. It is anticipated that 350 to 400 employees will be paid through the system. A means should be provided to update the allocation table prior to each payroll run.

Program Functional Specification:

Allocation Table A utility program or special program is needed to create and update the Allocation Table. It is anticipated that up to 450 person entries may be required. The table should accomodate allocation of each employee's pay to up to four TCI General Ledger accounts. Refer to the exhibit following the narrative for an example of the table. A similar format in coding pad form should be developed to facilitate table creation and update.

Conversion Program Refer to TCI documentation for DEC/TCI input tape record format. Refer to Microdata Payroll system documentation for format of its output.

Each employee payroll expense record created on Micodata(MD) must be converted to the DEC/TCI General Ledger format. As this process is performed each MD record amount must be allocated according to the percentage established for each DEC/TCI account. Amounts lost due to rounding should be applied to the first mostsignificant account contained in the allocation table. The total amount allocated must equal the amount input for each employee. Control totals based on total payroll expense amounts input from MD and allocated to DEC/TCI must be maintained and displayed on hardcopy at the conclusion of the run to be able to ensure that the input and output files are in balance.

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EXHIBIT I

EXAMPLE OF ALLOCATION TABLE
and
CODING FORM FORMAT

(1)	(2)	(3)	(4)									
RECORD CODE	EMPLOYEE * SOCIAL SECURITY NO.	Percent	1st FOC			Percent	2nd FOC			Pct.	3rd FOC and if	
		%	Major	Minor	Acct. Code	%	Major	Minor	Acct. Code	%		
3	///-//-////	/	//	//	/////	/	//	//	////	/		

(1) Record Code for entry form only - A - Add, C - Change, D - Delete.

(2) Social Security number recorded in a manner consistent with manner used by Microdata system.

(3) Percent of amount allocated to DBC/TCl account (4).

(4) The FOC used in the TCl General Ledger system which will receive the allocated amount. The percentage for each table entry should equal 100%. Any amounts lost through rounding should be included in first FOC account.

* If dashes are not included in MD format, they should be excluded here also. The field can then be compressed to nine places.

5-30-80

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ORGANIZATION CHART

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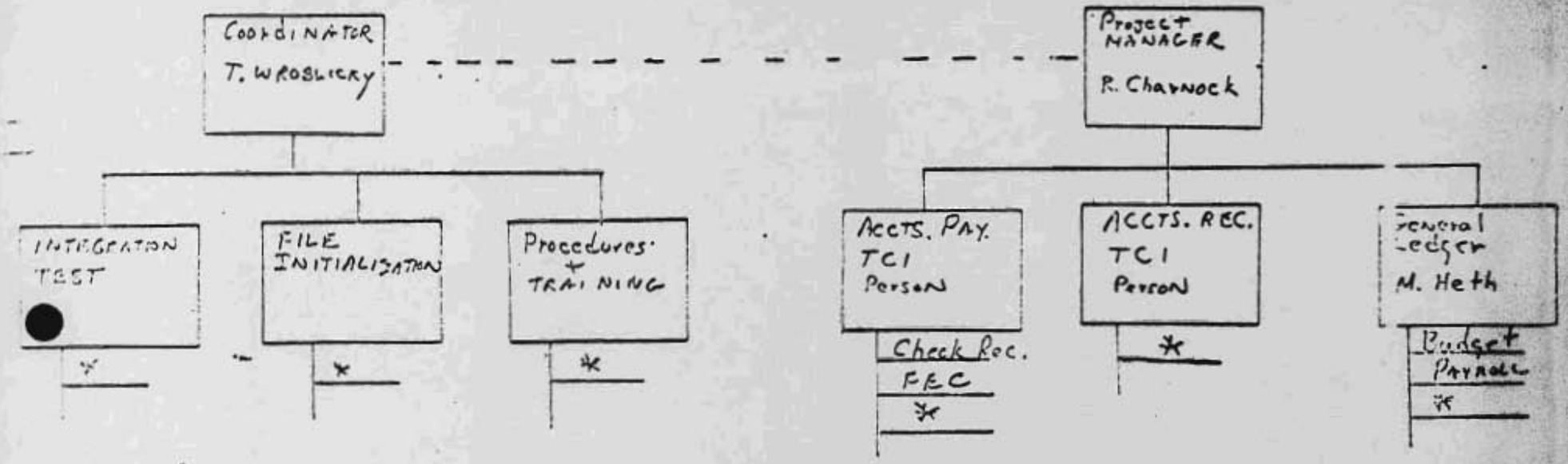

* Support Staff as needed

8304042033S

Republican
National
Committee

Ron Charnock
Director
Computer Services Division

MEMO TO: Ted Wroblicky

FROM: Ron Charnock

DATE: May 30, 1980

RE: User Training and User Procedures

This will confirm our conversation yesterday of your acceptance of primary responsibility for the above areas in connection with the RFP Accounting system. I would suggest you coordinate training schedules for RFP staff with the appropriate TCI instructors.

Please let me know if this arrangement is not satisfactory.

RC:fb

CC: Bay Buchanan
Arlene Triplett

BCC: Marcus Heth

Republican
National
Committee

MEMO TO: Ted Wroblicky

FROM: Ron Charnock

RE: Reagan for President Accounting System Requirements

DATE: May 30, 1980

Per our discussion yesterday, there are several decisions that must be made by the treasurer's office of the RFP campaign.

By Monday A.M., June 2, 1980, we must know what your Functional Organization Chart (FOC) structure will be. You will recall that this defines the organization hierarchical structure and that the RNC is committed to a XXX/XXX two level structure.

Additionally, by Friday A.M., June 6, 1980, we require your initial trial balance definition and a first cut of your chart of accounts.

In addition, it would be most helpful if you could provide some preliminary organization/department chart.

Thank you for your prompt attention to these requirements.

cc: Bay Buchanan
Arlene Triplett

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Republican National Committee

MEMO TO: Ted Wroblicky

FROM: Ron Charnock

RE: Accounting System charges to the Reagan for President Committee

DATE: May 28, 1980

Based on estimates of volume, developed by Marcus and me, and based on your estimated requirements of 6 video terminals and 2 printers at 120 characters per second, I estimate that the charges to the Reagan for President Committee will be as follows under our current charge back rate structure:

1.	Connect time	$40,320
2.	CPU utilization	44,800
3.	Disk Storage	5,000
4.	Printing - RNC	5,000
5.	Personnel	10,000
	TOTAL	$104,800

I've attached a copy of our rate structure for your evaluation.

Please bear in mind that the above is only an estimate of the charges, not an actual committment to the charges. The figures do not include any costs associated with hardware. It's my estimate that the cost of the CRT's, printers and modems will probably run up to $10,000. I suggest that the Reagan for President Committee order all equipment through the Computer Services Division to insure compatability.

Please let me know if you have any questions or need additional information.

cc: Arlene Triplett
Bay Buchanan

attachment

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REPUBLICAN NATIONAL COMMITTEE

COMPUTER SERVICES DIVISION

REPNET DATA BASES

The RNC's REPNET System maintains hundreds of data files, both public and private. The information is stored either on-line, on one of three 200 million character disk drives or in its 4,000 reel magnetic tape library.

PUBLIC DATA BASES

UPI "A" WIRE INFORMATION

NEW YORK TIMES INDEX OF ARTICLES

ZIP CODE/CONGRESSIONAL DISTRICT CROSS REFERENCES FILE

DEMOGRAPHIC ZIP CODE FILES

DEMOGRAPHIC CENSUS GEOGRAPHIC FILES

DEMOGRAPHIC COUNTY FILES

COUNTY ELECTION RESULTS

PRECINCT ELECTION RESULTS

VOTER REGISTRATION NAME AND ADDRESS FILES

DAILY NEWSPAPERS

WEEKLY NEWSPAPERS

COLLEGE NEWSPAPERS

RADIO STATIONS

TELEVISION STATIONS

MEDIA MARKET/CONGRESSIONAL DISTRICT CROSS REFERENCE FILE

DEMOGRAPHIC MEDIA MARKET FILE

NATIONAL SURVEY INTERVIEW FILES

REPUBLICAN COUNTY OFFICIALS

REPUBLICAN STATE LEGISLATORS

REPUBLICAN COUNTY CHAIRMEN

PRIVATE DATA BASES

PRESIDENTIAL EVENTS FILE

U.S. SENATE ROLL CALL VOTES

U.S. HOUSE OF REPRESENTATIVES ROLL CALL VOTES

NATIONAL HOUSEHOLD NAME/ADDRESS FILES

STATE AND LOCAL SURVEY INTERVIEW FILES

MAIL CALL FILES

- OUTREACH
- SENIOR CITIZENS
- NATIONAL FEDERATION OF REPUBLICAN WOMEN
- SMALL BUSINESS
- VETERANS
- CATHOLIC PARISHES
- RNC CHAIRMAN'S CORRESPONDENCE
- VARIOUS STATE PARTY FILES

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ADONIS FILES

- RNC MAJOR DONOR FILES
- VARIOUS STATE PARTY DONOR FILES

PRESIDENTIAL QUOTES FILES

REPUBLICAN NATIONAL CONVENTION HOUSING FILES

CPA FILES

- REPUBLICAN NATIONAL COMMITTEE
- VARIOUS STATE PARTY FILES

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VOTER TURNOUT ANALYSIS

STATE	1980 PROJECTED TURNOUT	55% TURNOUT	TOP VOTE GETTER	YR	VOTE PCT	SECOND VOTE GETTER	YR	VOTE PCT
MONTANA	341,349	187,742	NIXON	72	57.9	FORD	76	52.
NEBRASKA	598,447	329,146	NIXON	72	70.5	FORD	76	59.
NEVADA	233,318	128,325	NIXON	72	63.7	LIST	76	57.
NEW HAMP	355,542	195,548	NIXON	72	64.0	THOMSON	76	57.
NEW JERS	3,366,575	1,851,616	CASE	72	62.5	NIXON	72	61.
NEW MEX	474,097	260,753	NIXON	72	61.0	SCHMITT	76	56.
NEW YORK	7,124,615	3,918,538	NIXON	72	58.6	DURYEA	78	45.
NORTH CAR	1,920,616	1,056,339	NIXON	72	69.5	HELMS	78	54.
NORTH DAK	297,011	163,356	NIXON	72	62.1	STROUP	76	56.
OHIO	4,466,828	2,456,755	NIXON	72	59.6	RHODES	78	49.
OKLAHOMA	1,122,171	617,194	NIXON	72	73.7	FORD	76	50.
OREGON	1,094,993	602,246	HATFLD	78	61.6	PKWOOD	76	54.
PENN	5,060,977	2,783,537	NIXON	72	59.1	SCHWKR	74	53.
RHODE IL	439,617	241,789	CHAFEE	76	57.7	NIXON	72	53.
SOUTH CAR	1,059,994	582,997	NIXON	72	70.8	THURMD	72	63.
SOUTH DAK	320,956	176,526	PRESS	78	66.8	JNKLOW	78	56.
TENNESSEE	1,665,144	915,829	NIXON	72	67.7	BAKER	72	61.
TEXAS	4,532,042	2,492,623	NIXON	72	66.2	CLMNTS	78	50.
UTAH	563,680	310,024	NIXON	72	67.6	FORD	76	62.
VERMONT	199,080	109,494	STFFRD	72	64.3	NIXON	72	62.
VIRGINIA	1,988,103	1,093,457	NIXON	72	67.8	DALTON	77	58.
WASH	1,656,345	910,990	NIXON	72	56.9	EVANS	72	50.
WEST VIRG	777,341	427,538	NIXON	72	63.6	MOORE	72	54.
WISCONSIN	2,094,940	1,152,217	DREYFS	78	54.4	NIXON	72	53.
WYOMING	162,249	89,237	HANSEN	72	71.3	NIXON	72	69.

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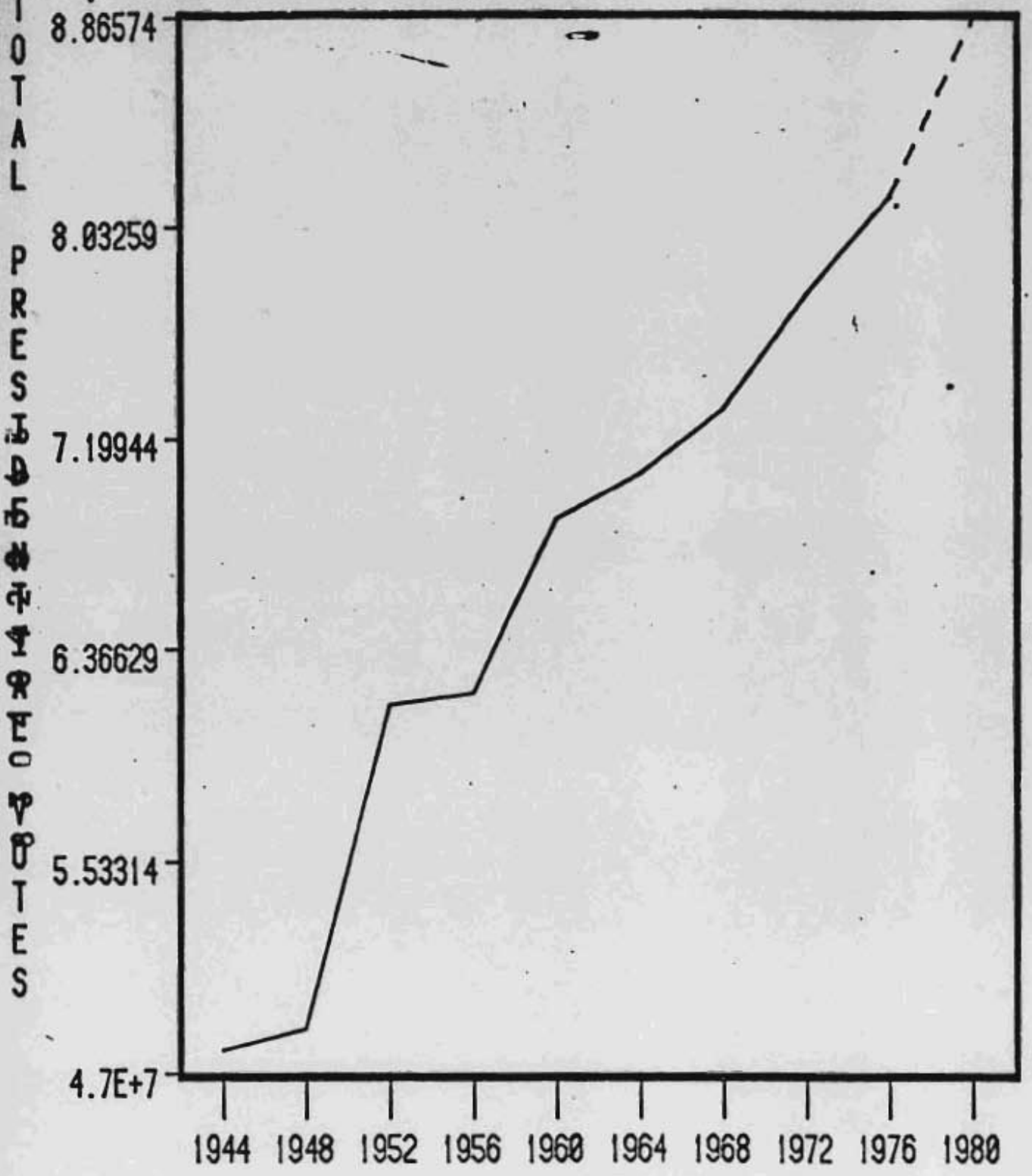
VOTER TURNOUT ANALYSIS

UNITED STATES



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Republican
National
Committee

MEMO TO: Ted Wroblicky

FROM: Marcus Heth

RE: RFP Accounting

DATE: May 6, 1980

Ted:

You will find attached the RFP Accounting Conversion Schedule.

We have made a few minor changes in the last 2 days and had it typed up for easier reading. I'm happy to report that we're on schedule if not ahead of schedule with our conversion efforts.

If you have any questions or problems, please don't hesitate to call.

cc: Ron Charnock
Bay Buchanan

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5/30/80

RNC ACCOUNTING CONVERSION SCHEDULE

System	Module	Design hours	Design date	Develop hours	Develop date	Test hours	Test date	Implement hours	Implement date	User Document hours	Train date	Overall Responsibility
PR	RNC/Alloc-Add -Update	5	6/2 ✓	8	6/3 ✓	4	6/4 ✓			7	6/11 ✓	MH
PR	RNC/PR-DEC-GL Link	7	6/4 ✓	8	6/5 ✓	4	6/6 ✓					MH
PR	RNC/GL-Tape -Trans	3	6/4 ✓	5	6/5	2	6/6 ✓			2	6/11 ✓	MH
PR	Allocation-File Report	1	6/7 ✓	3	6/4 ✓	1	6/5 ✓					MH
PR	Microdata-GL Trans Report	1	6/3	3	6/4	1	6/5 ✓					MH
PR	DEC Tape GL Trans to Disk									2	6/12 ✓	MH
PR	Final Investigation	12	6/4									MH
PR	System Test					6	6/9 ✓					MH
PR	Implementation								6/10 ✓			

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System	Module	Design hours	Design date	Develop hours	Develop date	Test hours	Test date	Implement hours	Implement date	Use. Document hours	Use. Document date	Train.	Overall Responsibility
	NOTE: The current ICI AP system does not accept an explanation for a voucher. The RNC is modifying the code to accept an explanation. The RFP will be required to enter an explanation but if they wish, they need not use it.												
AP	APT030 Add Explanation	3	6/11✓	6	6/12✓	3	6/13✓		6/20✓				MH
AP	APF350 AP-AP Recon	4	6/12✓	8	6/16✓	3	6/17✓		6/20✓				MH
AP	APF350 AP Recon Rpt	3	6/12✓	4	6/17✓	3	6/18✓		6/20✓				MH
AP	APF672 FEC Check Recon	5	6/12✓	8	6/19✓	3	6/20✓		6/20✓				MH

5/30/84

PRC ACCOUNTING CONVERSION SCHEDULE

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System	Module	Design hours	Design date	Develop hours	Develop date	Test hours	Test date	Implement hours	Implement date	User Document hours	User Document date	Train	Overall Responsibility
CHK Recon	AP-AP Recon Report	4	6/11 ✓	7	6/16 ✓	3	6/18 ✓			2	6/23 ✓		MH
CHK Recon	Outstanding Recon Report	3	6/12 ✓	6	6/17 ✓	2	6/17 ✓			2	6/24 ✓	2 6/23 ✓	MH
CHK Recon	Deletion Function	3	6/13 ✓	7	6/17 ✓	4	6/18 ✓			5	6/20 ✓	4 6/21 ✓	MH
CHK Recon	-AP Recon Transaction	4	6/10 ✓	6	6/14 ✓	3	6/16 ✓			2	6/20 ✓		MH
CHK Recon	AP Recon Daily Deletion Rpt	3	6/18 ✓	5	6/19 ✓	3	6/19 ✓			2	6/23 ✓		MH

5/31/80

MFP ACCOUNTING CONVERSION SCHEDULE

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System	Module	Design hours	Design date	Develop hours	Develop date	Test hours	Test date	Implement hours	Implement date	User Document hours	User Document date	Train	Overall Responsibility
GL	GLX100 FEC File Create	4	6/11 ✓	10	6/12 ✓	5	6/13 ✓						MH
GL	FEC File Report	3	6/14 ✓	5	6/15 ✓	2	6/15 ✓						MH
	NOTE: At this point no special parameters have been defined for this FEC Report.												
GL	GLT040 Define Trial Bal	3	6/16 ✓	5	6/17 ✓		6/25 ✓						TW
GL	GLT045 Trial Bal FOC	2	6/16 ✓	4	6/18 ✓		6/25 ✓						TW
GL	GLT040 Def Balance Sheet	3	6/17 ✓	5	6/19 ✓		6/25 ✓						TW
GL	GLT045 Balance Sheet FOC	2	6/19 ✓	4	6/20 ✓		6/25 ✓						TW
GL	GLT045 Def Operating Statement	3	6/20 ✓	5	6/20 ✓		6/25						TW
GL	GLT045 Operating FOC	2	6/23 ✓	4	6/23 ✓		6/25 ✓						TW
GL	Budget Performance	1	6/6 ✓	4	6/19 ✓		6/27 ✓						MH
GL	Bdgt Performance Sub Dev Acct	1	6/16 ✓	4	6/19 ✓		6/27 ✓						MH
GL	Bdgt Performance Sub Div	1	6/6 ✓	4	6/20 ✓		6/27 ✓						MH
GL	Bdgt Performance Acct	1	6/6 ✓	4	6/20 ✓		6/27 ✓						MH

Report Writer Functions

RFP ACCOUNTING CONVERSION SCHEDULE

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System	Module	Design hours	Design date	Develop hours	Develop date	Test hours	Test date	Implement hours	Implement date	User Document hours	User Document date	Train.	Overall Responsibility
GL	Determine GL Key								6/4 ✓				TW
GL	Provide RFP with Documentation								5/26 ✓				MH
GL	Provide RFP with Preliminary Forms								6/10 ✓				MH
GL	Provide RNC with Chart of Accts & Trans Types								6/6 ✓				TW
GL	Provide RNC with FOC								6/6 ✓				TW
GL	Provide RNC with GL Accounts								6/10 ✓				TW
	NOTE: The overall installation of the GL system will be completed for the RNC by 6/13/80. Since the RFP system is a subset of the RNC system, detail of the installation is not necessary												
GL	Setup Directories and Accounts	4	6/12 ✓	12	6/18 ✓				6/18 ✓				MH
GL	Train RFP in GL Procedures										Week of 6/19-24 ✓		TW
GL	Enter COA for Test							6	6/23 ✓				TW & MH
GL	Enter FOC for Test							6	6/24 ✓				TW & MH
GL	Enter GL Keys for Test							6	6/24 ✓				TW & MH
GL	Perform overall System Test					6/25-27 ✓							TW & MH
GL	Perform Test runs whenever Desirable					7/1-15 ✓							TW

8304042037 1

5/30/83 RFP ACCOUNTING CONVERSION SCHEDULE

System	Module	Design hours	Design date	Develop hours	Develop date	Test hours	Test date	Implement hours	Implement date	User Document hours	User Document date	Train hours	Train date	Overall Responsibility
PR	Provide RFP with Check Format													RNC Accounting by June 5
PR	Have Check Forms Printed													RFP - July 15
PR	Provide RFP with input Forms for Duplication													RNC Accounting by June 10
PR	Set up Accounts & Files							6	7/1 ✓					MH
PR	Modify Report Headings							8	7/2 ✓					MH
PR	Enter Test Data							5	7/3 ✓			5	7/3 ✓	RFP & RNC
PR	Perform System Test					8	7/4 ✓					8	7/4	RFP & RNC
PR	Clear Files							3	7/7 ✓					MH
PR	Enter Live Data	Anytime after 7/7 by RFP												

1 Note: The overall interface test between the Microdata and DEC & PR transactions will be completed by the 2nd week in June. Please refer to RNC Accounting conversion schedule. PR No 1-of 1

2 Note: Below are times for changing PR programs to allow for CA taxes to be deducted. If it is determined that other states must be included, the decision must be relayed to Marcus Heth as soon as possible. At this point the RNC will not proceed with the CA modifications until written approval from the RFP.

PR	Modify Existing Programs to Accept CA	8	6/23 ✓	20	6/25 ✓	6	6/26 ✓	6	7/2 ✓					MH

8304042037 2

System	Module	Design hours	Design date	Develop hours	Develop date	Test hours	Test date	Implement hours	Implement date	User Document hours	User Document date	Train	Overall Responsibility
AP	Provide RFP with Documentation								5/26 ✓				MN
AP	Provide RFP with Preliminary Forms								6/10 ✓				MN
AP	Define Vendor Types	3	6/24 ✓						6/24 ✓				TW
AP	Setup Directories and Accounts	4	6/19 ✓	12	6/31 ✓								TW
AP	Train RFP in AP Procedures											Week of 6/25-7/1	TW
AP	Enter Bank Control Info for Test							2	7/1 ✓				TW & MN
AP	Enter Vendor Control Info for Test							4	7/1 ✓				TW & MN
AP	Enter Vendors for Test							4	7/1 ✓				TW & MN
AP	Enter Vouchers for Test							4	7/2 ✓				TW & MN
AP	Perform System Test		7/2 - 7/4 ✓										TW & MN
AP	Perform Test runs whenever desired		7/7 - 7/15 ✓										TW

NOTE: The overall installation of the AP system will be completed for the RNC by 6/20/80. Since the RFP system is a subset of the RNC system, detail of the installation is not necessary. Modules of particular interest to the RFP are outlined on page 1 of the AP sheet.

NIP ACCOUNTING CONVERSION SCHEDULE

8304042037 3

System	Module	Design hours	Design date	Develop hours	Develop date	Test hours	Test date	Implement hours	Implement date	User Document hours	User Document date	Train	Overall Responsibility
General Install	Order CRT								5/27 ✓				SH
General Install	Order Printers - 180 cps								5/27 ✓				MH
General Install	Order Phone Lines - 6 dedicated lines								5/27 ✓				MRC
General Install	Review 300 LPM decision								6/6 ✓				TW
General Install	Make 300 LPM decision								6/9 ✓				RJC/RFP
General Install	Determine phone locations in building												TW
General Install	Install Equipment												
General Install	Test Equipment												

2/1/50 WP ACCOUNTING CONVERSION SCHEDULE

8304042037 4

System	Module	Design hours	Design date	Develop hours	Develop date	Test hours	Test date	Implement hours	Implement date	User Document hours	User Document date	Train.	Overall Responsibility
AR	Review Documentation				5/30 ✓								TW
AR	Make AR Decision				6/10 ✓								RNC/RFP

NOTE: If a decision to purchase the AR system is made, the RNC will follow the regular TCI installation schedule. Since we have installed two previous systems we should be able to install the AR system by the last week in July or first week in August. Since the documentation of the AR system is in TW's hands I cannot determine exact times. Once I have that documentation and the RFP determines modifications to the system then I can accurately assess time and manpower estimates.

AR	RNC Receives Documentation				ASAP								TW

COST

MEMORANDUM

republican national committee

TO: File

FROM: Leah Charnock

DATE: April 25, 1980

Regarding my letter to Roger Stone dated April 17th, I have been informed via telephone conversation with Steve Winchell on April 23rd that Roger advised Steve that additional approval of the Reagan package to be mailed to our non-current contributors was not necessary as the changes made to the current package are technical in nature.

lgc

cc: Jack Faris

8304042037 5

April 17, 1980

Mr. Roger Stone
Reagan for President Committee
809 Cameron Street
Alexandria, Virginia 22314

Dear Roger:

Thank you for your continued help in regards to the Governor Reagan package.

Attached is a slightly revised version. The only changes made to the package previously approved are technical. For your convenience, I have enclosed our old package and the revised letter with the changes circled.

If this meets with your approval, please sign off on it and forward it to me within the next week.

Roger, once again thanks for the time you have devoted to this project. If you have any questions do not hesitate to call me.

Sincerely,

Leah G. Charnock
Director,
Direct Response

encl.

cc: Jack Faris
Phil Smith

R6

June 2, 1980

Mrs. Edna M. Wakefield
2014 1st Avenue
Scottsbluff, Nebraska 69361

Dear Mrs. Wakefield.

I am not writing you today to ask for your help in my own Presidential campaign.

Instead, I am writing to ask for your personal support in a very important project that could affect, dramatically, the entire outcome of the 1980 election.

The Republican National Committee has just launched a special nationwide survey of eligible voters on key defense and foreign policy issues facing our country today.

1980 Sustaining Member

Because you are a Republican supporter you have been selected to be one of the participants from your state in a new national opinion poll on U.S. defense and foreign policy.

The answers you give will help the Committee and all our candidates mount a unified attack against the disastrous retreat and disarmament policies of Mr. Carter and the liberal Democrats that have led us to the severe international crisis we are in today.

(inactive)

As a Republican contributor your opinions are extremely important to me and our Party. So please, I strongly urge you to answer the questions carefully and then mail back your survey to me immediately.

Since Mr. Carter assumed the Presidency 3 years ago, he has made many radical and unprecedented changes in our defense and foreign policy programs.

As a result, for the first time since our nation was attacked at Pearl Harbor on December 7, 1941, the ability of the U.S. to defend itself and its allies is now in serious jeopardy.

Our military experts admit our weakness. Our defense department knows it. And worst of all, our enemies know it, too.

The "try and stop me" Soviet military invasion of Afghanistan is

8304042037 7

tragic proof of the total failure of Mr. Carter and the liberal Democrats to stop the worldwide Russian political and military advance. This invasion is only another step in the long-range Soviet plan to cut off our oil from the Persian Gulf, a catastrophic event that would radically change the world balance of power in favor of the Soviet Union.

Clearly, America is losing its influence, its friends and its power in a dangerously unstable world. And the reason is simple.

We have a man in the White House who is incapable of effectively handling defense and foreign policy matters, and who, by his own public admission, fails to understand the nature and threat of the Soviet Union.

One recent example of what I'm talking about is Carter's handling of the discovery of a Soviet combat brigade in Cuba.

Mr. Carter, in front of the nation and the world, said the status quo was "unacceptable". But then he backed down from this direct Soviet/Cuban challenge and accepted, for the first time, the presence of Soviet combat troops in our hemisphere.

Another prime example is Mr. Carter's sudden sellout of Taiwan. Acting on his own he scrapped our defense treaty with Taiwan without even consulting the U.S. Senate!

Did Mr. Carter demand anything from Communist China in exchange for extending diplomatic recognition? No. In fact, he admitted he didn't even ask Peking for a promise not to invade Taiwan.

Since he has surrounded himself with McGovern-type disarmament advisors, it's clear Mr. Carter has become one of the most anti-defense Presidents ever to occupy the White House. And his record over the past 3 years proves it!

Despite Republican opposition, Mr. Carter cancelled the neutron bomb and cancelled the B-1 bomber. Then he delayed development of the sea-launched cruise missile, the MX mobile missile system and ordered a massive cut in Navy shipbuilding. Each and every one of these decisions has weakened our defenses to the danger point.

Worst of all, Mr. Carter cut back our Navy shipbuilding program at the same time the Soviets were increasing their fleet to twice the size of ours. This one decision alone seriously jeopardizes U.S. ability to keep the Persian Gulf oil shipping lanes free from Russian interference.

What have the Russians been doing while Mr. Carter and the Democrats in Congress made these drastic arms cutbacks? Plenty.

Using subversion and armed aggression they have captured one country after another: Afghanistan, Angola, Ethiopia, Mozambique, South Yemen, Vietnam. And the list is growing.

8304042037 8

Everyone knows the Russians are building the biggest offensive weapons arsenal in the history of the world and using the threat of their military power to close in on one country after another.

It's clear to me that unless we substantially increase our defense spending now and change the direction of our foreign policy it will simply be too late to stop the Russians from even more dangerous moves around the world.

We've backed down on the presence of Russian combat troops in Cuba. We've allowed a fanatic in Iran to capture and hold Americans hostage. And the Carter Administration's policy of weakness has allowed the Soviets to invade Afghanistan. What next?

Never have I talked with more voters who are worried and confused about America's decline under Mr. Carter and the Democrat Congress. If more voters are told the whole truth about our military weakness under the Democrats we can defeat them in record numbers.

That's why Bill Brock and I are both so convinced that we can -- and must -- elect more Republicans to the U.S. House and Senate in 1980. But it will be impossible without your financial support.

Right now we're at a major turning point in this campaign. What our party can do to help our candidates get the facts out to the voters on the radical foreign policy and defense records of their opponents depends on you.

The single most important thing you can do to help, as a supporter of the Party, is to send a special contribution to the Committee today. not in other letter Republican National

I believe the U.S. Defense and Foreign Policy Survey project is the best weapon we have to 1) alert Americans to these dangers and 2) dramatize the total opposition of concerned citizens to the "disarm and retreat" policies of this Democrat Congress and Administration.

So please return your survey answers along with your campaign contribution to the Committee today.

I'm sure, as a politically active person,
Since you are a politically active person, I'm sure you are asked to give your help on many other projects.

But I can't think of anything more important to you or me than the survival of our country. And never, in my memory, have the dangers to America been as great as they are today.

For years the liberal Democrats running Congress have based their whole defense and foreign policy actions on the belief that if we disarm the Russians will follow our good example.

Well, they haven't. Instead the Russian aim is to immobilize our country, piece by piece, by exporting revolution, and by exploiting our growing military and political weaknesses around the world.

8304042037 9

You and I have already seen, in the actions of the Ayatollah Khomeini and the Russian conquest of Afghanistan, a frightening preview of what's to come if America fails to stop and reverse its decline. This is why I'm really counting on you to help the Republican National Committee today.

Bill Brock tells me the RNC has budgeted $14.7 million for the upcoming national election. That's the minimum amount our Republican candidates will need to finance their campaigns to expose the reckless policies of Mr. Carter and the Democrats in Congress.

Republican candidates do not have Big Union slush funds or disarmament lobbyist money to finance their campaigns. The one and only major source of support we have comes from the individual contributions sent in by Sustaining Members like you.

When Bill told me that only 40% of this $14.7 million campaign budget has been raised to date I was deeply concerned. Because I know every dollar of this campaign budget must be raised as soon as possible.

That's why I hope, when you mail back your survey, you will consider rushing a campaign contribution for the larger of the two amounts listed on your reply form.

Believe me, I do not want to live in a world where the United States is powerless to defend its interests and where our government and citizens are held hostage around the world.

That's not the kind of world I want nor would I wish it for my children or my grandchildren.

Now is the time to help our candidates launch a unified attack on the Democrats' radical defense and foreign policy actions. I'm hoping you will renew your financial support for 1980 by sending the largest contribution you can today.

Sincerely,

Ronald Reagan

RR/jb

P.S. Over and above my hopes for my own campaign, is my ferverent hope and prayer that we elect more Republicans to the U.S. Congress and Senate in order to restore our country's strength and security. I beleive America's survival depends on it.

8304042038C

Revised Contribution Form

Contributor Copy

From: Mrs. Edna M. Wakefield
2014 1st Avenue
Scottsbluff, Nebraska 69361

To: Bill Brock,
Chairman

69361SKFLO 14EO F5

☐ I agree with Governor Reagan that we must defeat the liberal Democrats whose "disarm and retreat" policies have seriously jeopardized U.S. national security.

I want to renew my Republican Party Sustaining Membership for 1980. Enclosed is my contribution (checked below) to help you raise the full campaign budget you need to help our candidates launch a unified attack against the Democrats' dangerous defense policies and elect a record number of pro-defense Republicans in 1980.

☐ HPC upgrade ☐ HPC ☐ _____ (other)

☐ YES, I've answered the Survey and have enclosed it along with my check that I've made payable to: Republican National Committee.

8304042038 1

Republican
National
Committee

Membership Office
Finance Division

February 12, 1980

Mr. Roger Stone
Reagan for President Committee
1828 L Street, N.W.
Suite 201
Washington, D.C.20036

Dear Roger:

Thank you for assisting the RNC in obtaining Governor Reagan's signature for our March 14th Masterfile mailing. I have attached another agreement which pertains to our in-house list. If you would sign said agreement and forward it to me using the enclosed envelope, I would be most appreciative.

In addition, when mailing our masterfile names, we would prefer the Reagan for President Committee to use our computer facility which is Communications Corporation of America. Please call me as soon as possible if you have any problems with this.

Sincerely,

Leah

Leah G. Charnock
Director,
Direct Response

cc: Jack Faris
Phil Smith ✓

8304042038

PAID FOR BY THE REPUBLICAN NATIONAL COMMITTEE
A copy of our report is filed with and is available from the Federal Election Commission, Washington, D.C.

C00250

February 12, 1980

Reagan for President Committee
1828 L Street, N.W.
Suite 201
Washington, D.C. 20036

Gentlemen:

This letter sets forth the terms and conditions of your agreement with the Republican National Committee (RNC) with respect to the use of names, addresses, or other information to which you may obtain access as a result of using portions of the RNC's Masterfile.

It is understood that the Reagan for President Committee will not duplicate any lists obtained from the RNC nor will it exchange, rent, sell or otherwise make available to any person or organization any information contained on any RNC lists to which the Reagan for President Committee may obtain access. The Reagan for President Committee further agrees that it will not exchange, rent, sell or otherwise make available to any person or organization the names, addresses, or other information concerning individuals responding to any mailing conducted as a result of any list exchange with the RNC.

The signature of the parties, affixed below, will signify understanding and acceptance of the terms and conditions set forth in this letter. The attached copy of this letter is for your records.

Very truly yours,

Donald L. Ivers
House Counsel

REPUBLICAN NATIONAL COMMITTEE

BY: Donald L. Ivers

date 2/12/80

REAGAN FOR PRESIDENT COMMITTEE

BY: _____

date _____

83042038?

Republican National Committee

Joe M. Rodgers
Finance Chairman

MEMORANDUM

TO: ROGER STONE

FROM: LEAH CHARNOCK

DATE: JANUARY 25, 1980

RE: YOUR MEMO OF JANUARY 21st

1. Due to a number of reasons the Reagan prospect package is not dropping until January 28th, which is about 14 days later than we hoped.

2. The mailing will go out bulk rate to the following lists (all 5M cells):

Point Blank
EPACO
Conservative Businessmen Who Contribute
Bedrock Republicans
Conservative Donors in Demand
SWA Masterfile
NARC Hotline
Dallas Magazine
Superior Multiples
Superior Moderates
Texas Conservatives
RNC Issues File
RNC Multiples File
RNC 73/74 Inactives
Orange County Cal. Registered Republicans
Ventura County Cal. Registered Republicans
Palm Beach Florida Registered Republicans
National Taxpayers Union
Business Week Actives
Prime Conservative Contributors

In order to get the majority of the names, at the lowest price I suggest doing a select the first week in March. If we roll out with several of the lists the select dates can be speeded up substantitally.

If you have any questions, please give me a call.

cc: Jack Faris
Phil Smith

8304042038 4

REAGAN for PRESIDENT

1828 L Street, N.W.
Suite 201
Washington, D.C. 20036
202/861-5000

January 21, 1980

MEMORANDUM

TO: LEAH CHARNOCK

FROM: ROGER STONE R

1) When can we expect a first select of names produced by the RNC-RR prospect package?

2) Can you provide a list of those lists you are prospecting with your RR letter so we can determine whether to dupe-drop the names you provide us against our own file?

RJS/djh

Reagan for President – United States Senator Paul Laxalt, Chairman. Bay Buchanan, Treasurer.
A copy of our report is filed with and available for purchase from the Federal Election Commission, Washington, D.C. 20463

8304042038 5

Quantity - 1004

Use - etc. - 1 - 8 1/2 - [illegible]

LISTS

Point Blank

RPAC-O

Conservative Businessmen who Contribute

Seabrook Republicans

Conservative Democrats for Reagan

SWA Master File

N. MARC. Hotline

Dallas Magazine

Superior Multiples

Susp. Mockingbird

Texas Conservatives

RNC Issues File

RNC Multiples File

73/74 Inactives (RNC)

Orange Co. Calif. Reg. Reps.

Ventura " " " "

Palm Beach Fl. Reg Reps.

Natl. Taxpayers Union

Business Week Actives

Prime Conservative Contributors

Mailing

December 20, 1979

Mr. Roger Stone
Reagan for President Committee
1828 L Street, N.W.
Suite 201
Washington, D.C. 20036

Dear Roger:

Thanks for your assistance in having Governor Reagan sign a direct mail piece for the Republican National Committee.

In exchange, the RNC agrees to allow the Reagan for President Committee to do a one time mailing to respondees to the RNC package signed by Governor Reagan. The Reagan Committee will be responsible for all costs involved with generating contributor respondees to the Reagan RNC package in accordance with FEC guidelines.

The Reagan for President Committee will be responsible for all costs involved with your mailing.

All proceeds and names generated as a result of the Reagan Committee's use of RNC names will become the property of the Reagan for President Committee.

It is understood that these names are not to be exchanged, rented or sold to any outside organization, consulting firm or individual without my prior written consent.

I hope that we can receive prompt approval of the package. As you well know, the quicker we roll out the mailing, the quicker you will have names.

Roger, thanks again. I have heard many good things about you and look forward to working with you in the months ahead.

Sincerely,

S. Jackson Faris

8 3 0 4 0 7 2 0 3 3 7

8304203890

February 12, 1980

Mr. Roger Stone
Reagan for President Committee
1828 L Street, N.W.
Suite 201
Washington, D.C.20036

Dear Roger:

Thank you for assisting the RNC in obtaining Governor Reagan's signature for our March 14th Masterfile mailing. I have attached another agreement which pertains to our in-house list. If you would sign said agreement and forward it to me using the enclosed envelope, I would be most appreciative.

In addition, when mailing our masterfile names, we would prefer the Reagan for President Committee to use our computer facility which is Communications Corporation of America. Please call me as soon as possible if you have any problems with this.

Sincerely,

Leah C. Charnock
Director,
Direct Response

cc: Jack Faris
Phil Smith

February 12, 1980

ent Committee
W.

20036

forth the terms and conditions of your
he Republican National Committee (RNC)
the use of names, addresses, or other
hich you may obtain access as a result of
f the RNC's Masterfile.

that the Reagan for President Committee
ate any lists obtained from the RNC nor will
nt, sell or otherwise make available to any
iz ion any information contained on any RNC
the Reagan for President Committee may obtain
agan for President Committee further agrees
t exchange, rent, sell or otherwise make
y person or organization the names, addresses,
nat n concerning individuals responding to
ducted as a result of any list exchange with

f the parties, affixed below, will signify
and acceptance of the terms and conditions set
letter. The attached copy of this letter is
ds.

Very truly yours,

Donald L. Ivers
House Counsel

TIONAL COMMITTEE REAGAN FOR PRESIDENT COMMITTEE

BY: _____

80 _____ date _____

C01003

February 12, 1980

gan for President Committee
8 L Street, N.W.
te 201
hington, D.C. 20036

tlemen:

is letter sets forth the terms and conditions of your reement with the Republican National Committee (RNC) th respect to the use of names, addresses, or other formation to which you may obtain access as a result of ing portions of the RNC's Masterfile.

is understood that the Reagan for President Committee ll not duplicate any lists obtained from the RNC nor will exchange, rent, sell or otherwise make available to any rson or organization any information contained on any RNC sts to which the Reagan for President Committee may obtain cess. The Reagan for President Committee further agrees at it will not exchange, rent, sell or otherwise make ailable to any person or organization the names, addresses, other information concerning individuals responding to y mailing conducted as a result of any list exchange with e RNC.

e signature of the parties, affixed below, will signify derstanding and acceptance of the terms and conditions set rth in this letter. The attached copy of this letter is r your records.

Very truly yours,

Donald L. Ivers
House Counsel

PUBLICAN NATIONAL COMMITTEE

e 2/12/80

REAGAN FOR PRESIDENT COMMITTEE

BY:

date 2/14/80

an Airgun
I did pass
Unique corporation
two weeks
[illegible] Dr. C
[illegible] 1808 St
811-5000

8304204

WERE OUT

8100 Pres. Exchg

December 20, 1979

Mr. Roger Stone
Reagan for President Committee
1828 L Street, N.W.
Suite 201
Washington, D.C. 20036

Dear Roger:

Thanks for your assistance in having Governor Reagan sign a direct mail piece for the Republican National Committee.

In exchange, the RNC agrees to allow the Reagan for President Committee to do a one time mailing to respondees to the RNC package signed by Governor Reagan. The Reagan Committee will be responsible for all costs involved with generating contributor respondees to the Reagan RNC package in accordance with FEC guidelines.

The Reagan for President Committee will be responsible for all costs involved with your mailing.

All proceeds and names generated as a result of the Reagan Committee's use of RNC names will become the property of the Reagan for President Committee.

It is understood that these names are not to be exchanged, rented or sold to any outside organization, consulting firm or individual without my prior written consent.

I hope that we can receive prompt approval of the package. As you well know, the quicker we roll out the mailing, the quicker you will have names.

Roger, thanks again. I have heard many good things about you and look forward to working with you in the months ahead.

Sincerely,

S. Jackson Faris

8304020 8

Republican
National
Committee

Bill Brock
Chairman

December 20, 1979

Reagan for President Committee
1828 L Street, N.W.
Suite 201
Washington, D.C. 20036

Gentlemen:

This letter sets forth the terms and conditions of your agreement with the Republican National Committee (RNC) with respect to the use of names, addresses, or other information to which you may obtain access as a result of a list exchange program.

It is understood and agreed that the Reagan for President Committee will not duplicate any lists obtained from the RNC nor will it exchange, rent, sell or otherwise make available to any person or organization any information contained on any RNC lists to which the Reagan for President Committee may obtain access. The Reagan for President Committee further agrees that it will not exchange, rent, sell or otherwise make available to any person or organization the names, addresses, or other information concerning individuals responding to any mailing conducted as a result of any list exchange with the RNC.

The signatures of the parties, affixed below, will signify understanding and acceptance of the terms and conditions set forth in this letter. The attached copy of this letter is for your records.

Very truly yours,

Donald L. Ivers

DONALD L. IVERS
House Counsel

REPUBLICAN NATIONAL COMMITTEE

BY: Jack Farris

DATE: 12/20/79

REAGAN FOR PRESIDENT COMMITTEE

BY _____

DATE: _____

8304042039

Republican National Committee

Bill Brock
Chairman

MEMORANDUM

TO: Roger Stone

FROM: Phil Smith

DATE: December 20, 1979

RE: RNC Prospect Lists Available for Presidential Candidates

1)	RNC Issues File (Survey Responders)	65,252
2)	Common Situs	280,418
3)	73/74 Inactive Contributors	62,131
4)	72 & Prior Inactive Contributors	127,135
5)	'76 RNC Prospects	177,636
	TOTAL	712,572

Please call me if have any questions concerning the above lists.

cc: Leah Charnock

8304042039 4

MEMORANDUM

republican national committee

MEMORANDUM

TO: JACK FARIS

FROM: LEAH CHARNOCK

DATE: DECEMBER 18, 1979

RE: REAGAN SIGNATURE

I talked to Roger Stone regarding the possibility of Ronald Reagan signing a prospect letter for the RNC. Roger said that he would be more than glad to sign a letter for us, to be mailed January through June of 1980. The Reagan Committee would like to mail to our respondees (contributors only of a certain dollar amount) once. This obviously is a good break for the RNC and I would like to move ahead with it as soon as possible.

He also said he would like to test our prospect lists.

cc: Phil Smith

LGC/ssq

8304042039 5

Republican
National
Finance
Committee

S. Jackson Faris
Executive Director

031003

December 20, 1979

Mr. Roger Stone
Reagan for President Committee
1828 L Street, N.W.
Suite 201
Washington, D.C. 20036

Dear Roger:

Thanks for your assistance in having Governor Reagan sign a direct mail piece for the Republican National Committee.

In exchange, the RNC agrees to allow the Reagan for President Committee to do a one time mailing to respondees to the RNC package signed by Governor Reagan. The Reagan Committee will be responsible for all costs involved with generating contributor respondees to the Reagan RNC package in accordance with FEC guidelines.

The Reagan for President Committee will be responsible for all costs involved with your mailing.

All proceeds and names generated as a result of the Reagan Committee's use of RNC names will become the property of the Reagan for President Committee.

It is understood that these names are not to be exchanged, rented or sold to any outside organization, consulting firm or individual without my prior written consent.

I hope that we can receive prompt approval of the package. As you well know, the quicker we roll out the mailing, the quicker you will have names.

Roger, thanks again. I have heard many good things about you and look forward to working with you in the months ahead.

Sincerely,

Jack

S. Jackson Faris

8304042036

Republican National Committee

Bill Brock
Chairman

December 20, 1979

Reagan for President Committee
1828 L Street, N.W.
Suite 201
Washington, D.C. 20036

Gentlemen:

This letter sets forth the terms and conditions of your agreement with the Republican National Committee (RNC) with respect to the use of names, addresses, or other information to which you may obtain access as a result of a list exchange program.

It is understood and agreed that the Reagan for President Committee will not duplicate any lists obtained from the RNC nor will it exchange, rent, sell or otherwise make available to any person or organization any information contained on any RNC lists to which the Reagan for President Committee may obtain access. The Reagan for President Committee further agrees that it will not exchange, rent, sell or otherwise make available to any person or organization the names, addresses, or other information concerning individuals responding to any mailing conducted as a result of any list exchange with the RNC.

The signatures of the parties, affixed below, will signify understanding and acceptance of the terms and conditions set forth in this letter. The attached copy of this letter is for your records.

Very truly yours,

DONALD L. IVERS
House Counsel

REPUBLICAN NATIONAL COMMITTEE

BY: Jack Favis

DATE: 12/20/79

REAGAN FOR PRESIDENT COMMITTEE

BY _____

DATE: _____

8304042039?

MEMORANDUM

republican national committee

TO: Leah DATE: October 22, 1979

FROM: Ann RE: Contribution split with Reagan Presidential Committee

Per your question concerning the contribution that the RNC split with the Reagan Presidential Committee, I can give you the following information:

Tha original check came from Howard T. and Martha D. Kelsey. See the attached copy of the memo I received from Jay Banning when he brought the check to me to be processed. Jay forwarded to the Reagan Committee a check for $500.00 and all of the necessary information about the contributor for their use. He sent this information to the Los Angeles office:

Reagan for President Committee
9841 Airport Boulevard, Suite 1430
Los Angeles, California 90045

The information was marked to the attention of Bay Buchanan, the committee treasurer.

The original check was deposited into the RNC account ($1000.00). Mr. Kelsey received an acknowledgement for a contribution of $500.00 from the RNC.

This is all the information I was able to collect. If you have any questions pertaining to this matter, please see me.

attachment

8304042037 8

Republican
National
Committee

September 11, 1979

TO: Ann Nimmer, Finance

FROM: Jay Banning, Accounting

SUBJECT: Attached Check

The attached check from Howard T. or Martha D. Kelsey, Nine Quarter Circle Ranch, Gallatin Gateway, Montana 59730 is in the amount of $1,000.00. You should only credit Mr. Kelsey for a $500.00 contribution because it was his request that only 50% of his contribution go to the RNC and the other 50% go to Reagan for President. I have issued an RNC check to the Reagan for President Committee.

Mr. Kelsey's principal place of business is the same as above and his occupation (per Ms. Carol Browning) is an executive.

If you have any other questions regarding this contribution, please contact me immediately.

9F

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
GENERAL COUNSEL
81 APR 9 P3:10

MEMORANDUM TO: CHARLES STEELE

FROM: MARJORIE W. EMMONS/JODY CUSTER

DATE: APRIL 9, 1981

SUBJECT: REFERRAL OF LETTER FROM THE REPUBLICAN NATIONAL COMMITTEE, dated April 6, 1981 (MUR 1252)

The attached letter was received in Chairman McGarry's office and then forwarded to the Office of the Commission Secretary. It is provided for your action.

Attachment:
Letter from Donald L. Ivers

8304042049

Republican
National
Committee

Donald L. Ivers
House Counsel

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

81 APR 9 P1: 34

31 APR 9 P3: 10

RECEIVED
GENERAL COUNSEL

April 6, 1981

Chairman
Federal Election Commission
1325 K Street, N. W.
Washington, D. C. 20463

RE: MUR 1252(80)

Gentlemen:

This will confirm my earlier telephone conversations with Ms. Anne Weissenborn of the Office of General Counsel with respect to discovery in the above noted matter. In the course of that conversation, it was agreed that representatives of the Office of General Counsel would examine the documents and materials compiled by the Republican National Committee in response to the Federal Election Commission's subpoena at the offices of the Republican National Committee on Thursday, April 9, 1981.

As I advised Ms. Weissenborn during our conversation, we will provide the documents and materials compiled and necessary space within which to conduct the examination and stand ready to offer any further cooperation and assistance as may be necessary in moving toward a final resolution of this matter.

Respectfully submitted,

Donald L. Ivers

DLI:jd

cc: Chairman Richard Richards
Reagan/Bush Committee

8304042041

Republican
National
Committee.

0 3 0 4 0 4 0 9 2

WASHINGTON
AM
17 APR

DISTRICT OF COLUMBIA

The Chairman
Federal Elections Commission
1325 K Street, N. W.
Washington, D. C. 20463

83 APR 8 AM 11:33

CCOM #41447

Republican
National
Committee

Donald L. Ivers
House Counsel

RESPONSE TO SUBPOENA TO PRODUCE DOCUMENTS AND MATERIALS
AND ORDER TO ANSWER WRITTEN QUESTIONS

TO:

Chairman, Federal Election Commission
1325 K Street, N. W.
Washington, D. C. 20463

RE: MUR 1252 (80)

8304041205

The Republican National Committee, by and through its Counsel, and in response to Federal Election Commission "Subpoena to Produce Documents and Materials and Order to Answer Written Questions," profers the information set forth below. Additionally, and preliminarily, the Republican National Committee would respectfully direct the attention of this Commission to rules adopted by the 1980 Republican National Convention on July 15, 1980, at Detroit, Michigan, a copy of which is attached hereto as Exhibit A. In referring to those Rules, it should be noted that, in the Preamble to those Rules, it is stated that the Rules are adopted as "the Rules for the election and government of the Republican National Committee . . . " [emphasis supplied]. Further, at Rule 19(a), it is stated that "(t)he Republican National Committee shall have the general management of the Republican Party in the United States, the District of Columbia, Guam, Puerto Rico, and the Virgin Islands . . . " And, further, at Rule 24(a), it is stated that "(t)he national committee shall issue the call for the next national convention to nominate candidates for President and Vice President of the United States . . . " And, finally, at Rule 27, it is stated that "(t)he national committee shall have the power to declare vacant the seat of any member who refuses to support the Republican nominees for President and/or Vice President."

The recitation of the Rules as set forth in the preceding paragraph is simply to emphasize the position of the Republican National Committee that one of its principal duties and responsibilities is to support the Republican nominee for the office of President of the United States. Thus, a substantial portion of the efforts of the Republican National Committee and its staff during a Presidential election year is related, directly or indirectly to, in the case of the 1980 campaign, "Ronald Reagan's nomination as the Republican candidate for President or Ronald Reagan's general election campaign for President." [Quotation from Federal Election Commission Subpoena to Produce Documents and Materials and Order to Answer Written Questions.]

In light of the above, the Republican National Committee has attempted to be as specific as possible in the compilation of the materials requested

by the Commission's subpoena. It is, however, respectfully submitted that, broadly interpreted, the Commission's "Subpoena to Produce Documents and Materials and Order to Answer Written Questions" becomes little more than a request by the Commission to embark on a "fishing expedition" through the files and records of the Republican National Committee without regard to relevance or materiality.

With the discussions set forth above in mind, the following information is submitted:

I. SUBPOENA TO PRODUCE DOCUMENTS AND MATERIALS: the specific requests and the response thereto are set forth, seriatim, below:

Question 1: All documents and materials concerning meetings, discussions, correspondence, or other communications between the RNC and any of the following persons or organizations or their officials, employees, staff members, volunteers, organizers, or agents which relate in any way to the efforts of the RNC or the below listed organizations or individuals with respect to Ronald Reagan's nomination as the Republican candidate for President or Ronald Reagan's general election campaign for President in 1980:

Reagan for President Committee
Reagan General Election Committee
1980 Republican Presidential Unity Committee
Reagan-Bush Committee
Reagan for President Compliance Fund
Ruth Jones, Ltd.
Bailey, Deardourff & Associates, Inc.
Fund for a Conservative Majority
Citizens for Reagan in 1980
North Carolina Congressional Club
Americans for Reagan
National Conservative Political Action Committee
The Ronald Reagan Victory Fund
Americans for Change
Reagan for President in '80
Americans for an Effective Presidency
Anna Chennault
Stuart Spencer
Senator Jesse Helms
James Lake

Answer: The documents and materials requested herein, insofar as they exist with respect to the Republican National Committee, shall be produced for inspection, by prior agreement, at the offices of the Republican National Committee, on Thursday, April 9, 1981.

Question 2: All documents and materials relating to the contractual or professional relationship or any other association from January 1980 to

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present, between the RNC and the following entities, their agents, officers, or employees undertaken in connection with efforts on the part of the RNC which relate in any way to Ronald Reagan's general election campaign for President in 1980 or which would aid in the defeat of any other 1980 Presidential candidate.

Bailey, Deardourff and Associates, Inc.
Diversified Direct, Inc.
Wiland and Associates
Telepost
Arthur Finkelstein and Associates
Bedford Printing
Ruth Jones, Ltd.

Answer: The documents and materials requested herein, insofar as they exist with respect to the Republican National Committee, shall be produced for inspection, by prior agreement, at the offices of the Republican National Committee, on Thursday, April 9, 1981.

Question 3: All telephone bills and/or other records of telephone calls made or received by the RNC from May, 1980 to the present.

Answer: The documents and materials requested herein, insofar as they exist with respect to the Republican National Committee, shall be produced for inspection, by prior agreement, at the offices of the Republican National Committee, on Thursday, April 9, 1981.

II. WRITTEN QUESTIONS (Interrogatories):

Question A: Please identify all officers, directors, employees, staff members, media time buyers, volunteers, consultants, advisory council members or other agents of the RNC from September 1979 to the present. With respect to each individual identified, please identify that person's supervisor.[1]

(1) Please identify which of the above individuals has and any other individuals who have participated in any way, directly or indirectly, in the oral or written authorization (express or implied) of any RNC expenditures which relate in any way to Ronald Reagan's general election campaign for President in 1980 or which would aid in the defeat of any other 1980 Presidential candidate.

(2) Please identify which of the above individuals and any other individuals who have participated in any way, directly or indirectly, in the production, conception, drafting, writing, editing, approval, review, presentation, printing, publication, distribution or dissemination of documents and materials which relate in any way to Ronald Reagan's campaign election for President in 1980, or which would aid in the defeat of any other Presidential candidate in 1980.

[1] In lieu of identifying the supervisor of each individual identified, in response to interrogatory A, RNC may provide the Commission with an organizational chart.

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Answer A: Rosters of the officers, employees and Advisory Council Members shall be provided to representatives of the Office of General Counsel at the same time as other documents and materials are produced for inspection on April 9, 1981. Employees and staff members are the same. Accurate records with respect to volunteers are not maintained as the term "volunteers" may be applied to literally thousands of individuals who assist, in one way or another, the Republican National Committee, or its employees, in connection with the various activities of the Republican National Committee throughout the United States. With respect to consultants, copies of consulting contracts covering the period in question shall be made available to representatives of the Office of General Counsel on April 9, 1981.

Answer A (1): The Chairman of the Republican National Committee, as the Chief Executive Officer of the Republican National Committee, had direct responsibility for any authorization of Republican National Committee expenditures of those funds authorized pursuant to 2 USC §441(a)(d)(2).

Answer A (2): Primary responsibility for the production, conception, drafting, writing, editing, approval, review, presentation, printing, publication, distribution or dissemination of all publications and other materials emanating from the Republican National Committee rest with the Director of the Public Affairs Department of the Republican National Committee, but under the authority of the Chairman of the Republican National Committee. The efforts of the entire staff of the Public Affairs Department of the Republican National Committee are directed toward these efforts.

Question B: List the phone numbers and extensions used by RNC from May, 1980 to the present, noting the extensions assigned to or used by each person identified in response to interrogatory A.

Answer B: Telephone rosters for the period in question will be provided to representatives of the Office of General Counsel on April 9, 1981.

Question C: List by date and location all fundraisers held by RNC since May, 1980 which related in any way to the election of Ronald Reagan as the President in 1980 or which related in any way to the defeat of any other 1980 Presidential candidate.

Answer C: Prelude to Victory Dinners, September 30, 1980, were held in the following cities:

Atlanta, Georgia
Boston, Massachusetts
Cleveland, Ohio
Cincinnati, Ohio
Denver, Colorado
Detroit, Michigan
Honolulu, Hawaii
Kansas City, Missouri
Los Angeles, California
Nashville, Tennessee
New York, New York
Oklahoma City, Oklahoma
Philadelphia, Pennsylvania
St. Louis, Missouri
San Francisco, Californi
Tulsa, Oklahoma
Washington, D. C.
Wichita, Kansas

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Question D: With respect to each individual identified in response to interrogatory A, please note whether that individual has had any past, or has any present association, either by way of employment, position, or membership with any of the below listed organizations, projects, or companies. With respect to each such association, note the dates during which each such person was so associated, with position(s) held with each.

Americans for Change
Reagan for President in '80
Americans for an Effective Presidency
Fund for a Conservative Majority
Citizens for Reagan in '80
The Republican Party
The Reagan for President Committee
Group '80
1980 Republican Presidential Unity Committee
Citizens for the Republic
Richard A. Viguerie Co., Inc.
Arthur J. Finkelstein & Associates
Ruth Jones, Ltd.
Bruce Eberle Associates, Inc.
Decision Making Information, Inc.
Bailey, Deardourff & Associates, Inc.
Citizens for the Republic
North Carolina Congressional Club
Americans for Reagan
National Conservative Political Action Committee
The Ronald Reagan Victory Fund
Committee for Independent Expenditures for Republicans
Target 80
The Conservative Coalition
The Conservative Caucus
Reagan 80
1980 United Republican Committee
Commitment 80

Answer D: To the best knowledge of the Republican National Committee, all individuals identified in response to Question A have "had any past, or has any present association, either by way of employment, position, or membership . . . " with the Republican Party. With respect to the other organizations listed herein, the past or present association of those individuals identified in Answer A is unknown.

Respectfully submitted,

Donald L. Ivers

DLI:jd
Enclosure

April 1981

8304042007

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

November 13, 1980

Donald L. Ivers, Esquire
House Counsel
Republican National Committee
310 First Street, S.E
Washington, D.C. 20003

Re: MUR 1252

Dear Mr. Ivers:

The Commission has received your letter of October 15, 1980 requesting an extension of time until November 24, 1980, in which to respond to its Subpoena to Produce Documents and Materials to the Republican National Committee ("RNC"), and moving to quash the Commission Order to Answer Written Questions. Upon review and consideration of your client's motion and request, the Commission, on November 5, 1980, voted to deny the RNC motion to quash and request for extension of time. A copy of the Commission's denial order is enclosed.

Accordingly, the RNC is requested to produce for inspection and copying the documents previously described in the Commission's September 29, 1980 subpoena, at Room 706, 1325 K Street, N.W., Washington, D.C. , on November 19, 1980, and all subsequent business days thereafter required to complete inspection. Answers to the written questions propounded by the Commission subpoena must be submitted to the above address within ten (10) days of your receipt of this letter.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Commission's Denial Order

8304042040 8

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Donald L. Ivers, Esquire
House Counsel
Republican National Committee
310 First Street, S.E
Washington, D.C. 20003

Re: MUR 1252

Dear Mr. Ivers:

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Accordingly, the RNC is requested to produce for inspection and copying the documents previously described in the Commission's September 29, 1980 subpoena, at Room 706, 1325 K Street, N.W., Washington, D.C. , on , 1980, and all subsequent business days thereafter required to complete inspection. Answers to the written questions propounded by the Commission subpoena must be submitted to the above address within ten (10) days of your receipt of this letter.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Commission's Denial Order

M66
11/12/80

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Americans for Change, et al.)

MUR 1252

COMMISSION ORDER

The motion of the Republican National Committee to quash the Commission Order to Answer Written Questions mailed on September 29, 1980, is denied. The motion of Republican National Committee for an extension of time until November 24, 1980 in which to comply with the Commission Subpoena to Produce Documents and Materials mailed on September 29, 1980, is also denied. The staff of the Office of General Counsel is directed to take all necessary and proper steps to ensure compliance with the requests contained in the Commission subpoena and order.

November 12, 1980
Date

JOHN WARREN McGARRY
Vice-Chairman

FEDERAL ELECTION COMMISSION
1325 K Street, N.W.
Washington, D.C. 20463

Attest:

Marjorie Emmons
Secretary to the Commission

8304042041 0

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 1252
Americans for Change, et al.)

CERTIFICATION

I, Marjorie W. Emmons, Recording Secretary for the Federal Election Commission's Executive Session of November 5, 1980, do hereby certify that the Commission decided by a vote of 4-2 to take the following actions in MUR 1252:

1. Deny the RNC motion to quash the FEC order to answer written questions, and the Committee's request for extension of time in which to respond to the FEC subpoena to produce documents and materials.

2. Direct that the letter be sent rescheduling the date for compliance with the Commission subpoena.

3. Authorize the General Counsel's Office to initiate an enforcement action should that compliance not be forthcoming from RNC.

Commissioners Harris, McGarry, Reiche, and Tiernan voted affirmatively for the decision; Commissioners Aikens and Friedersdorf dissented.

Attest:

11-5-80
Date

Marjorie W. Emmons
Marjorie W. Emmons
Secretary to the Commission

8304042041 1

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE MWE

FROM: MARJORIE W. EMMONS/MARGARET CHANEY mc

DATE: OCTOBER 28, 1980

SUBJECT: ADDITIONAL OBJECTIONS TO MUR 1252 - General Counsel's Report in Opposition to Motion to Quash or Modify Subpoena dated 10-21-80

You were notified by close of business on October 27, 1980, of an objection by Commissioner Friedersdorf to the above-named document.

Commissioner Reiche submitted an objection at 9:44, this date. Commissioner Aikens objected at 3:31, this date.

Also, Commissioner Tiernan submitted comments. A copy of his vote sheet is attached.

ATTACHMENT:
Copy of Vote Sheet

8304042041 2

48 HOUR TALLY SHEET

FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON D.C. 20463

Date and Time Transmitted: MONDAY, 10-27-80
4:00

Commissioner FRIEDERSDORF, AIKENS, TIERNAN, McGARRY, REICHE, HARRIS

RETURN TO OFFICE OF COMMISSION SECRETARY BY: EXPEDITE

MUR No. 1252 - General Counsel's Report in Opposition to Motion to Quash or Modify Subpoena, dated 10-21-80, Signed 10-24-80

(4) I approve the recommendation

( ) I object to the recommendation

COMMENTS: Please note discrepancy between OGC Report at p2, ¶1, L3 and Johnson letter at p2, ¶2 as to the first time the RNC had notice of subpoena, i.e. October 10 or 15.

Date: 10/28/80 Signature: Robert O. Tiernan

A DEFINITE VOTE IS REQUIRED AND ALL SHEETS SIGNED AND DATED. PLEASE RETURN ONLY THE VOTE SHEETS TO THE OFFICE OF THE COMMISSION SECRETARY NO LATER THAN THE DATE AND TIME SHOWN ABOVE.

8304042041 3

FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

MWE

MEMORANDUM TO: CHARLES STEELE

FROM: MARJORIE W. EMMONS/MARGARET CHANEY MC

DATE: OCTOBER 27, 1980

SUBJECT: MUR 1252 - General Counsel's Report dated 10-21-80; Received in OCS 10-27-80, 11:33

The above-named document was circulated on a 48 hour vote basis at 3:00, October 27, 1980 (Expedited).

Commissioner Friedersdorf submitted an objection at 3:35, October 27, 1980.

This matter will be placed on the Executive Session Agenda for Thursday, November 6, 1980.

8304042041

October 27, 1980

MEMORANDUM TO: Marjorie W. Emmons

FROM: Elissa T. Garr

SUBJECT: MUR 1252

Please have the attached General Counsel's Report distributed to the Commission on an expedited basis. (The old expedited, not the new.) Thank you.

8304042041

FEDERAL ELECTION COMMISSION

October 21,1980

RECEIVED
FEC MAIL ROOM
SECRETARY

In the Matter of)
)
) MUR 1252
Americans for Change, et al.)

80 OCT 21 AM: 33

GENERAL COUNSEL'S REPORT
IN OPPOSITION TO MOTION OF
REPUBLICAN NATIONAL COMMITTEE
TO QUASH OR MODIFY SUBPOENA

I. Summary of Proceedings

On September 3, 1980, the Commission found reason to believe that certain respondent political committees have or will violate 2 U.S.C. § 441a(a) and 26 U.S.C. § 9012(f) by making excessive in-kind contributions to Ronald Reagan and his authorized committees, and authorized the Office of General Counsel to conduct an investigation of this matter. On September 29, 1980, the Commission sent a subpoena to produce documents and materials and order to answer written questions to the Republican National Committee ("RNC"). Pursuant to 11 C.F.R. § 111.13(b), this subpoena was mailed to Patrick McCarten of Jones, Day, Reavis & Pogue, who at that time was designated as counsel for the RNC in this matter.

On October 16, 1980, the Commission received a motion from RNC for an extension until November 24, 1980, in which to produce the subpoenaed documents, and also moving that the Commission quash its order to answer written questions. See Attachment I. For the reasons set forth below, the Office of General Counsel recommends the Commission deny the extension requested as well as the motion to quash of RNC.

II. Legal Analysis

A. The Motion to Quash of RNC Lacks Sufficient Foundation in Law or Fact and Should Therefore be Denied.

The RNC first objects to the Commisson subpoena, alleging that the subpoena and order were not properly served on the Committee in accordance with 11 C.F.R. § 111.13. As previously noted, the RNC had initially designated Patrick McCarten of Jones, Day, Reavis & Pogue, as counsel for the RNC in MUR 1252. See Attachment II. Although sometime after July 24, 1980, the RNC had apparently determined to handle this matter through in-house counsel, it did not so notify the Commission of this decision until it filed the

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present motion to quash. Therefore, as required by 11 C.F.R. § 111.13(b), the Office of General Counsel on September 29, 1980, mailed the RNC subpoena to Mr. McCarten, who on October 10, 1980, forwarded the subpoena to the RNC. See Attachment III. In that the subpoena was, in fact, served on RNC counsel in accordance with Commission regulations, the Office of General Counsel submits that the Commission should reject this initial objection of the RNC.

RNC also seeks to have the Commission order to answer written questions quashed on the basis that the interrogatories are overbroad and irrelevant. The subpoena's interrogatories are designed to help the Commisison obtain facts which would reveal the relationship of the respondent committees to Ronald Reagan and his authorized committees (including the RNC) as well as forming a foundation for examination of witnesses upon oral deposition. As such, they are reasonably relevant to the objective of the investigation and therefore should not be quashed. See United States v. Morton Salt Co., 338 U.S. 632 (1950); Federal Trade Commission v. Texaco, 555 F.2d 862, 877 (D.C. Cir. 1977)(wide range of investigation is necessary and appropriate where numerous factual allegations in support of legal contention have been made); FEC v. Machinists Non-Partisan Political League, Misc. Action No. 79-0291, (D.D.C. January 28, 1980)(findings of fact and conclusions of law); Federal Election Commission v. Wisconsin Democrats for Change in 1980 in 1980, No. 80-C-124, Opinion and Order at 5 (W.D. Wisc. April 24, 1980).

RNC finally argues that the Commission order to answer written questions be quashed on the grounds that to compel a response at this time would place a burden on the Committee. It has been held that an agency subpoena must be enforced unless it is unreasonably burdensome or will "unduly disrupt" the activities of the subpoenaed party. Federal Trade Commission v. Texaco, 555 F.2d at 882. The only evidence of burden or undue disruption that RNC puts forth to support its contention is the fact that it will have to check through its files to comply with the subpoena. However, a subpoenaed party is normally expected to thoroughly review its records and make a reasonable effort in order to assure compliance with an agency order. Furthermore, it has been recognized that a subpoenaed party may be required to incur some burden, if necessary, to comply with the order of an agency seeking to meet its responsibility to conduct a thorough and expeditious investigation of possible unlawful activity. Id. See also 2 U.S.C. § 437g(a)(2) and (10).

B. The Extension Requested by RNC Would Unnecessarily Delay the Commission's Investigation and Accordingly Should be Denied.

The RNC also seeks an extension until November 24, 1980 in which to submit a response to the Commission's subpoena for production of documents and materials. 1/ RNC argues that the

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1/ The Office of General Counsel notes that the RNC does not unequivocally state that it will comply in full with the document request should the requested extension be granted.

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extension is necessary because of the press of activities due to the November 4 election. In view of its statutory mandate to conduct investigations expeditiously, it has not been Commission practice in the past to grant an extension of time in which to respond to a subpoena, based solely on the rationale that production would be required prior to an upcoming election. See e.g. FEC v. Dudley, No. M-80-9-L (D.N.H. April 25, 1980); General Counsel's Report in Opposition to Motion of Paul Kirk and Carl Wagner to Quash Subpoenas, MUR 1038 (April 4, 1980). Indeed, mindfull of a complainant's ability to sue the Commission for a failure to act, the Commission has in most instances, encouraged the Office of General Counsel to avoid, where possible, any unnecessary delays in the completion of its investigations of such complaints. Accordingly, the Office of General Counsel recommends that this RNC request for an extension be denied. However, should the Commission determine, that such an extension ought to be granted, the Office of General Counsel recommends that it not be granted unless the RNC agrees, in writing, to comply with the subpoena to the fullest extent possible, after the extension has expired.

III. RECOMMENDATION

Based on the above, the Office of General Counsel recommends that the Commission deny the RNC motion to quash the FEC order to answer written questions, and the Committee's request for extension of time in which to respond to the FEC subpoena to produce documents and materials. The Office of General Counsel also recommends that the Commission direct that the attached letter be sent rescheduling the date for compliance with the Commission subpoena; and authorize the General Counsel's Office to initiate an enforcement action should that compliance not be forthcoming from RNC. See 2 U.S.C. § 437g(b).

24 October 1980
Date

Charles N. Steele
General Counsel

Attachments
- I. Letter from RNC
- II. Front Cover of RNC Response to MUR 1252
- III. Letter from James Johnson of of Jones, Day, Reavis & Pogue
- IV. Letter to RNC
- V. Denial form
- VI. Commission Order

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GCO#2976

'80 OCT 16 A9:46

Republican
National
Committee

Donald L. Ivers
House Counsel

E. Mark Braden
Deputy House Counsel

October 15, 1980

Mr. Max Friedersdorf, Chairman
FEDERAL ELECTION COMMISSION
1325 K Street, N.W.
Washington, D.C. 20463

Dear Chairman Friedersdorf:

RE: MUR 1252 (80)

The Republican National Committee received on this date, a document entitled, "Subpoena To Produce Documents And Materials And Order To Answer Written Questions" regarding matters allegedly related to MUR 1252 (80).

The cover letter with the subpoena is dated October 1, 1980, and is addressed to Patrick F. McCartan, Esquire, of the law firm, Jones, Day, Reavis & Pogue, 1735 Eye Street, N.W., Washington, D.C.

The Republican National Committee was first advised of the existence of this subpoena and order by Mr. James Johnson also of the firm Jones, Day, Reavis & Pogue at approximately 11:00 a.m. on this date. Mr. Johnson has advised me of the circumstances surrounding the receipt of the subpoena by Jones, Day, Reavis & Pogue and of the handling of that subpoena subsequent to its receipt. Mr. Johnson has further indicated that he has delivered to the office of your General Counsel, a letter describing the handling of the subpoena after its receipt by Jones, Day, Reavis & Pogue.

Before discussing the subpoena and order, I might point out that, while my name and that of the General Counsel to the Republican National Committee, Ben Cotten, was included on the memorandum in response to the complaint, we were listed as "of Counsel". On July 24, 1980, Mr. Cotten and I filed a response on behalf of the Republican National Committee as Counsel for the Republican National Committee. At no time was the subpoena or order or a copy thereof provided to us. Nor was said subpoena and order served upon any registered agent, officer, director or agent in charge of any office of the Republican National Committee.

Given the extensive and, quite frankly, intrusive nature of the subpoena and the written questions and, further, given the fact that the service of said subpoena is not in accordance with Section 111.13 of the Regulations of the

Attachment I

8304042019

Federal Election Commission, the Republican National Committee respectfully moves the subpoena be modified to require response at some reasonable point in time after November 4, 1980. (see Federal Election Commission Regulations, § 111.15) I would respectfully suggest that the time be extended to November 24, 1980. My reason for requesting this modification should be obvious, in that we are now into the final three weeks of the 1980 General Election Campaign with our entire staff committed, full time, to the campaign at federal, state and local levels. To now require key members of our staff to research, review and cross check all of our files in order to determine, first, the existence of the information requested and then, further, to produce such information as may exist would cause extensive, unwarranted disruption of our activity at a crucial point.

The Republican National Committee further moves that the Commission quash the order to answer written questions and in support of that motion respectfully submits that the written questions seek information which is neither relevant nor material to the subject matter of MUR 1252 (80) and, further, they are so broad and overreaching in scope as to be burdensome and oppressive and incapable of adequate response.

Respectfully submitted,

Donald L. Ivers

DLI:fd

8304042042C

GCC# 2054 Carter/Weissenbach

RECEIVED

'80 JUL 24 PM 4:07

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BEFORE THE
FEDERAL ELECTION COMMISSION

CARTER-MONDALE REELECTION COMMITTEE, et al.,	:	
Complainants,	:	
v.	:	MUR 1252
RONALD REAGAN, et al.,	:	
Respondents.	:	

80 JUL 25 A10:40

RECEIVED
GENERAL COUNSEL

MEMORANDUM OF GOVERNOR RONALD REAGAN, REAGAN FOR PRESIDENT GENERAL ELECTION COMMITTEE, REAGAN FOR PRESIDENT COMMITTEE, REAGAN FOR PRESIDENT COMPLIANCE FUND AND REPUBLICAN NATIONAL COMMITTEE IN RESPONSE TO COMPLAINT

OF COUNSEL:

JONATHAN C. ROSE
ROBERT F. McDERMOTT, JR.
STEPHEN J. BROGAN
JANET L. MILLER
ROBERT C. WEBER
MARY LOUISE WESTMORELAND

JONES, DAY, REAVIS & POGUE
1735 Eye Street, N.W.
Washington, D.C. 20006

BEN W. COTTEN
General Counsel
DONALD L. IVERS
House Counsel
Republican National Committee
310 First St., S.E.
Washington, D.C. 20000

LOREN A. SMITH
Chief Counsel
Reagan for President General
Election Committee
901 S. Highland St.
Arlington, Virgina 22204

PATRICK F. McCARTAN
JAMES R. JOHNSON
1735 Eye Street, N.W.
Washington, D.C. 20006

Attorneys for Respondents Governor Ronald Reagan, Reagan for President General Election Committee, Reagan for President Committee, Reagan for President Compliance Fund and Republican National Committee

8304042021

Attachment II (emphasis supplied)

9106

80 OCT 15 P3:23

JONES, DAY, REAVIS & POGUE

1735 EYE STREET, N.W.
WASHINGTON, D.C. 20006

HAND DELIVERED

TEL. (202) 861-3939
CABLE-ATTORNEYS WASHINGTON
TELEX-DOMESTIC 89340
TELEX-INTERNATIONAL 64363
TELECOPIER-(202) 466-6642

IN CLEVELAND:
1700 UNION COMMERCE BUILDING 44115
(216) 586-3939

IN COLUMBUS:
50 WEST BROAD STREET, 43215
(614) 469-3939

IN LOS ANGELES:
2029 CENTURY PARK EAST 90067
(213) 553-3939

839700-004-010
7017:bam

October 15, 1980

10:40

Patricia F. Bak, Esq.
Office of the General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: MUR 1252(80)

Dear Ms. Bak:

This letter is in response to our telephone calls of this date regarding the subpoena and interrogatories directed to the Republican National Committee and received by our firm on October 7, 1980. You have requested a written explanation for the delay in responding to the discovery requests. At the outset, please accept my apology for the delay which is entirely my responsibility.

The subpoena arrived on my desk on October 8, 1980. On that day and the preceding day I was in Ithaca, New York interviewing students at the Cornell Law School interested in employment with Jones, Day. Prior to my departure I had instructed my secretary to send all further correspondence regarding MUR 1252(80) immediately to Loren Smith, Chief Counsel of the Reagan-Bush Committee because, as I had previously advised the Commission's General Counsel by letter, the Reagan-Bush Committee had decided to handle the remaining proceedings connected with MUR 1252(80) in-house. My secretary followed those instructions and sent the subpoena immediately to Loren Smith. My instructions were obviously deficient in that it had not occurred to me, as it should have, that the Commission would also seek discovery from the RNC after we had been informed, by letter dated September 25, 1980, that the Commission had found no reason to believe that the RNC had committed a violation. To be completely candid, upon my return from Cornell, the afternoon of October 9, I glanced quickly through the mass of papers which had accumulated on my desk during my absence, saw a file copy of the subpoena which my secretary had kept, saw her notation at the top that the document had been sent to Mr. Smith

Attachment III

8304042022

the preceding day, did not examine it further to learn that it was directed to the RNC and sent the file copy to the file. My erroneous thinking was that the RNC had been cleared, the Reagan Committee was now handling the matter itself and I no longer had to worry about the case.

After talking with you today and discovering what had happened, I immediately called Donald Ivers, House Counsel for the RNC, who was listed as "Of Counsel" on our response to the Complaint and who had submitted a separate response on behalf of the RNC to the Complaint. Thus, the first time the RNC became aware of the subpoena and interrogatories was today and I have now sent copies by messenger to him.

Mr. Ivers advised me that the RNC, like the Reagan Committee, now believes that it can most economically handle MUR 1252 in-house. I had not previously asked him about this or sent a letter to the Commission on the subject because it had not occurred to us that the RNC was a party to the investigation any more after we had been advised that the "Commission has closed its file in this matter as regards that allegation of a violation by the Committee," in the Commission's September 25, 1980 letter. Neither Don nor I had felt that there was any further need for legal representation of the RNC once the Commission had closed its file with regard to it.

Again, please accept my apology and be advised that all further communications regarding MUR 1252(80) should be sent directly to Donald L. Ivers, Esq., House Counsel, Republican National Committee, 310 First Street, S.E., Washington, D.C. 20003, telephone (202) 484-6639.

Sincerely,

James R. Johnson

cc: Donald L. Ivers, Esq.

8304042023

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Donald L. Ivers, Esquire
House Counsel
Republican National Committee
310 First Street, S.E
Washington, D.C. 20003

Re: MUR 1252

Dear Mr. Ivers:

The Commission has received your letter of October 15, 1980 requesting an extension of time until November 24, 1980, in which to respond to its Subpoena to Produce Documents and Materials to the Republican National Committee ("RNC"), and moving to quash the Commission Order to Answer Written Questions. Upon review and consideration of your client's motion and request, the Commission, on , 1980, voted to deny the RNC motion to quash and request for extension of time. A copy of the Commission's denial order is enclosed.

Accordingly, the RNC is requested to produce for inspection and copying the documents previously described in the Commission's September 29, 1980 subpoena, at Room 706, 1325 K Street, N.W., Washington, D.C. , on , 1980, and all subsequent business days thereafter required to complete inspection. Answers to the written questions propounded by the Commission subpoena must be submitted to the above address within ten (10) days of your receipt of this letter.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Commission's Denial Order

Attachment IV

8304042024

8304042042 5

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

**DENIAL OF MOTION TO QUASH
COMMISSION ORDER TO ANSWER
WRITTEN QUESTIONS**

The Federal Election Commission hereby denies the Motion of the Republican National Committee to Quash the Commission's Order to Answer Written Questions.

Max Friedersdorf
Chairman

John W. McGarry
Vice Chairman

Thomas E. Harris
Commissioner

Joan D. Aikens
Commissioner

Frank P. Reiche
Commissioner

Robert O. Tiernan
Commissioner

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

**DENIAL OF MOTION TO QUASH
COMMISSION ORDER TO ANSWER
WRITTEN QUESTIONS**

The Federal Election Commission hereby denies the Motion of the Republican National Committee to Quash the Commission's Order to Answer Written Questions.

Max Friedersdorf
Chairman

John W. McGarry
Vice Chairman

Thomas E. Harris
Commissioner

Joan D. Aikens
Commissioner

Frank P. Reiche
Commissioner

Robert O. Tiernan
Commissioner

8304042027

Attachment V

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Americans for Change, et al.) MUR 1252

COMMISSION ORDER

The motion of the Republican National Committee to quash the Commission Order to Answer Written Questions mailed on September 29, 1980, is denied. The motion of Republican National Committee for an extension of time until November 24, 1980 in which to comply with the Commission Subpoena to Produce Documents and Materials mailed on September 29, 1980, is also denied. The staff of the Office of General Counsel is directed to take all necessary and proper steps to ensure compliance with the requests contained in the Commission subpoena and order.

8304042028

Date

FEDERAL ELECTION COMMISSION
1325 K Street, N.W.
Washington, D.C. 20463

Attest:

Marjorie Emmons
Secretary to the Commission

Attachment VI

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RECEIVED
80 OCT 15 P 3:23

JONES, DAY, REAVIS & POGUE

1735 EYE STREET, N.W.
WASHINGTON, D.C. 20006

HAND DELIVERED

TEL. (202) 861-3939
CABLE-ATTORNEYS WASHINGTON
TELEX-DOMESTIC 89-2410
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IN LOS ANGELES:
2029 CENTURY PARK EAST 90067
(213) 553-3939

839700-004-010
7017:bam

October 15, 1980

10:40

Patricia F. Bak, Esq.
Office of the General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: MUR 1252(80)

Dear Ms. Bak:

This letter is in response to our telephone calls of this date regarding the subpoena and interrogatories directed to the Republican National Committee and received by our firm on October 7, 1980. You have requested a written explanation for the delay in responding to the discovery requests. At the outset, please accept my apology for the delay which is entirely my responsibility.

The subpoena arrived on my desk on October 8, 1980. On that day and the preceding day I was in Ithaca, New York interviewing students at the Cornell Law School interested in employment with Jones, Day. Prior to my departure I had instructed my secretary to send all further correspondence regarding MUR 1252(80) immediately to Loren Smith, Chief Counsel of the Reagan-Bush Committee because, as I had previously advised the Commission's General Counsel by letter, the Reagan-Bush Committee had decided to handle the remaining proceedings connected with MUR 1252(80) in-house. My secretary followed those instructions and sent the subpoena immediately to Loren Smith. My instructions were obviously deficient in that it had not occurred to me, as it should have, that the Commission would also seek discovery from the RNC after we had been informed, by letter dated September 25, 1980, that the Commission had found no reason to believe that the RNC had committed a violation. To be completely candid, upon my return from Cornell, the afternoon of October 9, I glanced quickly through the mass of papers which had accumulated on my desk during my absence, saw a file copy of the subpoena which my secretary had kept, saw her notation at the top that the document had been sent to Mr. Smith

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the preceding day, did not examine it further to learn that it was directed to the RNC and sent the file copy to the file. My erroneous thinking was that the RNC had been cleared, the Reagan Committee was now handling the matter itself and I no longer had to worry about the case.

After talking with you today and discovering what had happened, I immediately called Donald Ivers, House Counsel for the RNC, who was listed as "Of Counsel" on our response to the Complaint and who had submitted a separate response on behalf of the RNC to the Complaint. Thus, the first time the RNC became aware of the subpoena and interrogatories was today and I have now sent copies by messenger to him.

Mr. Ivers advised me that the RNC, like the Reagan Committee, now believes that it can most economically handle MUR 1252 in-house. I had not previously asked him about this or sent a letter to the Commission on the subject because it had not occurred to us that the RNC was a party to the investigation any more after we had been advised that the "Commission has closed its file in this matter as regards that allegation of a violation by the Committee," in the Commission's September 25, 1980 letter. Neither Don nor I had felt that there was any further need for legal representation of the RNC once the Commission had closed its file with regard to it.

Again, please accept my apology and be advised that all further communications regarding MUR 1252(80) should be sent directly to Donald L. Ivers, Esq., House Counsel, Republican National Committee, 310 First Street, S.E., Washington, D.C. 20003, telephone (202) 484-6639.

Sincerely,

James R. Johnson

cc: Donald L. Ivers, Esq.

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JONES, DAY, REAVIS & POGUE
1735 EYE STREET, N. W.
WASHINGTON, D. C. 20006

RECEIVED
80 OCT 15 P3:23
HAND DELIVERED

Patricia F. Bak, Esq.
Office of the General Counsel
Federal Election Commission
1325 K Street, N.W.

By Messenger

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GCO#2976

Republican National Committee

80 OCT 16 A9:46

Donald L. Ivers
House Counsel

E. Mark Braden
Deputy House Counsel

October 15, 1980

Mr. Max Friedersdorf, Chairman
FEDERAL ELECTION COMMISSION
1325 K Street, N.W.
Washington, D.C. 20463

Dear Chairman Friedersdorf:

RE: MUR 1252 (80)

The Republican National Committee received on this date, a document entitled, "Subpoena To Produce Documents And Materials And Order To Answer Written Questions" regarding matters allegedly related to MUR 1252 (80).

The cover letter with the subpoena is dated October 1, 1980, and is addressed to Patrick F. McCartan, Esquire, of the law firm, Jones, Day, Reavis & Pogue, 1735 Eye Street, N.W., Washington, D.C.

The Republican National Committee was first advised of the existence of this subpoena and order by Mr. James Johnson also of the firm Jones, Day, Reavis & Pogue at approximately 11:00 a.m. on this date. Mr. Johnson has advised me of the circumstances surrounding the receipt of the subpoena by Jones, Day, Reavis & Pogue and of the handling of that subpoena subsequent to its receipt. Mr. Johnson has further indicated that he has delivered to the office of your General Counsel, a letter describing the handling of the subpoena after its receipt by Jones, Day, Reavis & Pogue.

Before discussing the subpoena and order, I might point out that, while my name and that of the General Counsel to the Republican National Committee, Ben Cotten, was included on the memorandum in response to the complaint, we were listed as "of Counsel". On July 24, 1980, Mr. Cotten and I filed a response on behalf of the Republican National Committee as Counsel for the Republican National Committee. At no time was the subpoena or order or a copy thereof provided to us. Nor was said subpoena and order served upon any registered agent, officer, director or agent in charge of any office of the Republican National Committee.

Given the extensive and, quite frankly, intrusive nature of the subpoena and the written questions and, further, given the fact that the service of said subpoena is not in accordance with Section 111.13 of the Regulations of the

8304120432

Federal Election Commission, the Republican National Committee respectfully moves the subpoena be modified to require response at some reasonable point in time after November 4, 1980. (see Federal Election Commission Regulations, § 111.15) I would respectfully suggest that the time be extended to November 24, 1980. My reason for requesting this modification should be obvious, in that we are now into the final three weeks of the 1980 General Election Campaign with our entire staff committed, full time, to the campaign at federal, state and local levels. To now require key members of our staff to research, review and cross check all of our files in order to determine, first, the existence of the information requested and then, further, to produce such information as may exist would cause extensive, unwarranted disruption of our activity at a crucial point.

The Republican National Committee further moves that the Commission quash the order to answer written questions and in support of that motion respectfully submits that the written questions seek information which is neither relevant nor material to the subject matter of MUR 1252 (80) and, further, they are so broad and overreaching in scope as to be burdensome and oppressive and incapable of adequate response.

Respectfully submitted,

Donald L. Ivers

DLI:fd

8304042043?

Republican
National
Committee

Donald L. Ivers
House Counsel

E. Mark Braden
Deputy House Counsel

October 15, 1980

91 OCT 16 A9:47

Mr. Max Friedersdorf, Chairman
FEDERAL ELECTION COMMISSION
1325 K Street, N.W.
Washington, D.C. 20463

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Donald L. Ivers

DLI:fd

8304042043 5

Republican
National
Committee

Donald L. Ivers
House Counsel

E. Mark Braden
Deputy House Counsel

October 15, 1980

'80 OCT 16 A9:47

Mr. Max Friedersdorf, Chairman
FEDERAL ELECTION COMMISSION
1325 K Street, N.W.
Washington, D.C. 20463

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8304042036

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Respectfully submitted,

Donald L. Ivers

DLI:fd

8304042043 7

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 1, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Patrict F. McCartan, Esquire
JONES, DAY, REAVIS & POGUE
1735 Eye Street, N.W.
Washington, D.C. 20006

Re: Matter Under Review (MUR) 1252(80)

Dear Mr. McCartan:

Enclosed is a subpoena to produce certain documents and materials and order to answer written questions issued by the Federal Election Commission ("Commission") to your client, the Republican National Committee.

The subpoena requires that production of specified documents be made at the time and place stated therein and that responses to the interrogatories be propounded to the Commission within ten (10) days of your receipt of the enclosed order.

If you have any questions, please contact staff attorney Ms. Marsha Gentner at (202) 523-5071 or Ms. Patricia F. Bak at (202) 523-4060.

Sincerely,

Enclosur

8304042038

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

SUBPOENA TO PRODUCE DOCUMENTS AND MATERIALS
AND ORDER TO ANSWER WRITTEN QUESTIONS

TO:

Republican National Committee
310 First Street, S.E.
Washington, D.C. 20003

RE: MUR 1252

At the instance of the Federal Election Commission, pursuant to 2 U.S.C. §§ 437d(a)(1) and (3), the Republican National Committee is hereby ordered to produce for inspection and copying all documents and materials listed below that are in the possession or control of the Republican National Committee or of its officers, agents, staff members, volunteers or employees. Production is to be made at the Office of General Counsel of the Federal Election Commission at 1325 K Street, N.W., Washington, D.C. on October 15, 1980, at 10:00 a.m. In addition, the Republican National Committee is hereby ordered to submit responses in writing and under oath to the interrogatories propounded herein, to the Federal Election Commission within ten (10) days of its receipt of this order.

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As used in this subpoena, the terms listed below are defined as follows:

1. The term "documents and materials" shall mean the original, all copies, and drafts of writings of any kind, printed, audio, visual, or electronic materials including but not limited to correspondence, memoranda, reports, transcripts, minutes, pamphlets, leaflets, notes, letters, lists, telexes, telegrams, messages (including reports, notes, memoranda and any other documentation of telephone conversations and conferences), calendar and diary entries, contracts, data, agendas, articles, visual aides, computer print-outs, account statements, billing forms, receipts, checks and other negotiable paper, solicitation materials, records and compilations in the possession, custody or control of the Republican National Committee. Designated "documents and materials" are to be taken as including all attachments, enclosures and other documents that are attached to, relate to, or refer to such designated "documents and materials."

2. "Identify" with respect to individuals shall mean to give the full name, last known residence address of such individual, the last known place of business where such individual is or was employed, the title of the job or position held with entity in question, and the dates of such service.

3. "Republican National Committee" or "RNC" shall mean its predecessors, affiliates, committees, subcommittees; divisions, branches, projects, as well as any other bodies which conduct business on behalf of the RNC and the RNC's officers, agents, employees, staff, and volunteers.

4. "Reagan General Election Committee" shall mean the principal campaign committee (see 2 U.S.C. § 431(5)) of Ronald Reagan, the 1980 Republican nominee for the office of President, the committee's predecessors (including, but not limited to the Reagan for President Committee), affiliates, committees, subcommittees, divisions, branches, projects, as well as any other bodies which conduct business on its behalf, and its officers, agents, employees, staff and volunteers.

5. All references to the "FEC" shall mean the Federal Election Commission, its auditors, attorneys, and other employees.

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6. "FEC Disclosure Reports" shall mean any reports filed by the RNC with the FEC pursuant to the requirements of 2 U.S.C. §§ 431-455.

7. "Agent" shall mean any person who has actual, oral or written authority, either express or implied, to make or to authorize the making of expenditures on behalf of a candidate; or any person who has been placed in a position within the campaign organization where it could reasonably appear that in the ordinary course of campaign-related activities he or she may authorize expenditures. See 11 C.F.R. § 109.1(b)(5).

8. "Organizer" with reference to a project or group, shall mean any person who has directly or indirectly participated in the formation, planning, structure or organizational of the project or group in question including, but not limited to, attendance or participation in any meetings, discussions or communications concerning the project or group from the period from January 1979 to the group or project's formal inception.

9. The term "concerning" with reference to a subject or object shall mean mentioning, discussing, or directly or indirectly regarding, referring, or relative in any way to that subject or object.

If any document called for herein is withheld under a claim of privilege or objection, furnish a list identifying each such document for which the privilege or objection is claimed, together with the following information:

(a) a description of the subject matter;
(b) the date of the document;
(c) the name and title of the author;
(d) the name and title of the person to whom the document was addressed;
(e) the name and title of the person to whom the document was actually sent;
(f) the identity of any other person who read all or part of the document;
(g) the number of pages;
(h) the paragraph of this subpoena to which the document is otherwise responsive, and
(i) the nature of the claimed privilege.

Please produce in their entirety the following:

1. All documents and materials concerning meetings, discussions, correspondence, or other communications between the RNC and any

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of the following persons or organizations or their officials, employees, staff members, volunteers, organizers, or agents which relate in any way to the efforts of the RNC or the below listed organizations or individuals with respect to Ronald Reagan's nomination as the Republican candidate for President or Ronald Reagan's general election campaign for President in 1980:

Reagan for President Committee
Reagan General Election Committee
1980 Republican Presidential Unity Committee
Reagan-Bush Committee
Reagan for President Compliance Fund
Ruth Jones, Ltd.
Bailey, Deardourff & Associates, Inc.
Fund for a Conservative Majority
Citizens for Reagan in 1980
North Carolina Congressional Club
Americans for Reagan
National Conservative Political Action Committee
The Ronald Reagan Victory Fund
Americans for Change
Reagan for President in '80
Americans for an Effective Presidency
Anna Chennault
Stuart Spencer
Senator Jesse Helms
James Lake

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2. All documents and materials relating to the contractual or professional relationship or any other association from January 1980 to present, between the RNC and the following entities, their agents, officers, or employees undertaken in connection with efforts on the part of the RNC which relate in any way to Ronald Reagan's general election campaign for President in 1980 or which would aid in the defeat of any other 1980 Presidential candidate.

Bailey, Deardourff and Associates, Inc.
Diversified Direct, Inc.
Wiland and Associates
Telepost
Arthur Finkelstein and Associates
Bedford Printing
Ruth Jones, Ltd.

3. All telephone bills and/or other records of telephone calls made or received by the RNC from May, 1980 to the present.

Please answer the following interrrogatories:

A. Please identify all officers, directors, employees, staff members, media time buyers, volunteers, consultants, advisory council members or other agents of the RNC from September 1979 to the present. With respect to each individual identified, please identify that person's supervisor.[1/]

(1) Please identify which of the above individuals has and any other individuals who have participated in any way, directly or indirectly, in the oral or written authorization (express or implied) of any RNC expenditures which relate in any way to Ronald Reagan's general election campaign for President in 1980 or which would aid in the defeat of any other 1980 Presidential candidate.

(2) Please identify which of the above individuals and any other individuals who have participated in any way, directly or indirectly, in the production, conception, drafting, writing, editing, approval, review, presentation, printing, publication, distribution or dissemination of documents and materials which relate in any way to Ronald Reagan's campaign election for President in 1980, or which would aid in the defeat of any other Presidential candidate in 1980.

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1/ In lieu of identifying the supervisor of each individual identified, in response to interrogatory A, RNC may provide the Commission with an organizational chart.

B. List the phone numbers and extensions used by RNC from May, 1980 to the present, noting the extensions assigned to or used by each person identified in response to interrogatory A.

C. List by date and location all fundraisers held by RNC since May, 1980 which related in any way to the election of Ronald Reagan as the President in 1980 or which related in any way to the defeat of any other 1980 Presidential candidate.

D. With respect to each individual identified in response to interrogatory A, please note whether that individual has had any past, or has any present association, either by way of employment, position, or membership with any of the below listed organizations, projects, or companies. With respect to each such association, note the dates during which each such person was so associated, with position(s) held with each.

Americans for Change
Reagan for President in '80
Americans for an Effective Presidency
Fund for a Conservative Majority
Citizens for Reagan in '80
The Republican Party
The Reagan for President Committee
Group '80
1980 Republican Presidential Unity Committee
Citizens for the Republic
Richard A. Viguerie Co., Inc.
Arthur J. Finkelstein & Associates
Ruth Jones, Ltd.
Bruce Eberle Associates, Inc.
Decision Making Information, Inc.
Bailey, Deardourff & Associates, Inc.
Citizens for the Republic
North Carolina Congressional Club
Americans for Reagan
National Conservative Political Action Committee
The Ronald Reagan Victory Fund
Committee for Independent Expenditures for Republicans
Target 80

9304042044

The Conservative Coalition
The Conservative Caucus
Reagan 80
1980 United Republican Committee
Committment 80

WHEREFORE, the Vice Chairman of the Federal Election Commission has hereunto set his hand at the office of the Commission at 1325 K Street, N.W., Washington, D.C., this 29th day of September, 1980.

John W. McGarry
Vice Chairman

ATTEST:

Marjorie W. Emmons
Secretary to the Commission

8304042044 5

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

September 25, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Patrick F. McCartan, Esquire
Jones, Day, Reavis and Pogue
1735 I Street, N.W.
Washington, D.C. 20006

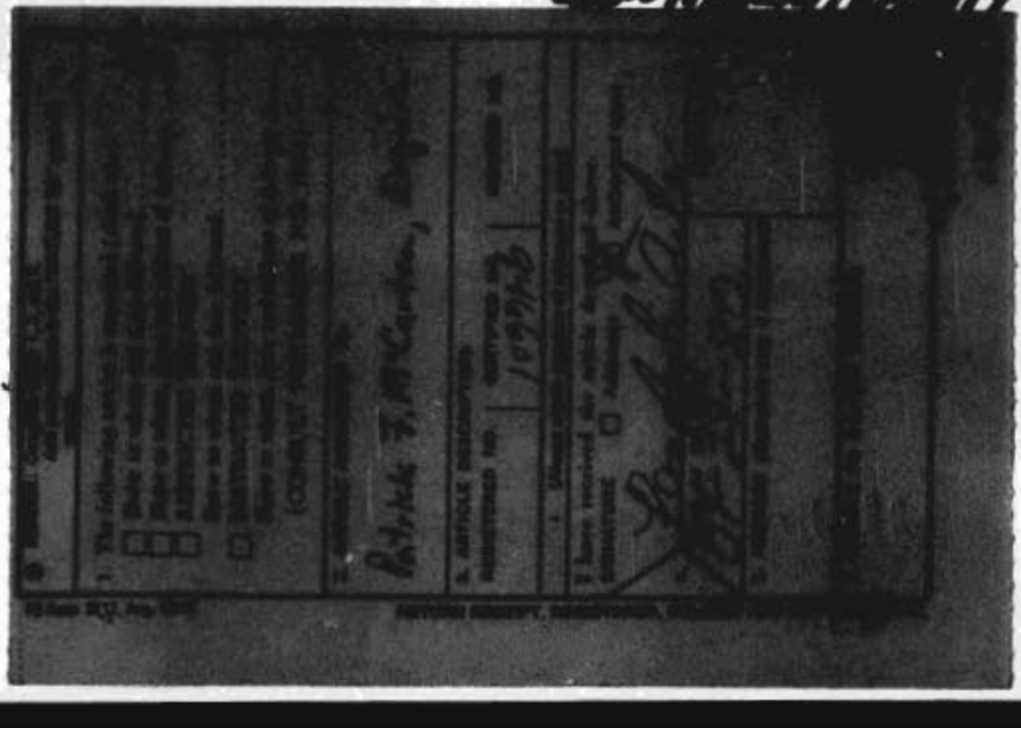
Re: MUR 1252

Dear Mr. McCartan:

On July 7, 1980, the Federal Election Commission notified your client, the Republican National Committee, ("the Commiteee"), of a complaint alleging that the Committee had violated provisions of the Federal Election Campaign Act of 1971, as amended ("the Act") and of Chapter 95 of Title 26, U.S. Code. A copy of the complaint was forwarded to the Committee at that time.

The Commission, on September 3, 1980, determined that on the basis of the information in the complaint and information supplied by you that there is no reason to believe that the Committee has violated 2 U.S.C. § 441a(d)(2). Accordingly, the Commission has closed its file in this matter as regards that allegation of a violation by the Committee.

Sincerely,



8304042046

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Patrick F. McCartan, Esquire
Jones, Day, Reavis and Pogue
1735 I Street, N.W.
Washington, D.C. 20006

Re: MUR 1252

Dear Mr. McCartan:

On July 7, 1980, the Federal Election Commission notified your client, the Republican National Committee, ("the Commiteee"), of a complaint alleging that the Committee had violated provisions of the Federal Election Campaign Act of 1971, as amended ("the Act") and of Chapter 95 of Title 26, U.S. Code. A copy of the complaint was forwarded to the Committee at that time.

The Commission, on September 3, 1980, determined that on the basis of the information in the complaint and information supplied by you that there is no reason to believe that the Committee has violated 2 U.S.C. § 441a(d)(2). Accordingly, the Commission has closed its file in this matter as regards that allegation of a violation by the Committee.

Sincerely,

8304042047

AW 9/25/80

Republican National Committee

Copy 2001

RECEIVED
OFFICE OF THE
GENERAL COUNSEL

80 JUL 24 P3:56

RECEIVED

'80 JUL 24 PM 3:41

HAND DELIVERED

July 24, 1980

Honorable Max L. Friedersdorf
Federal Election Commission
1325 K Street, N.W.
Washington, D. C. 20463

MUR 1252

Dear Chairman Friedersdorf:

The purpose of this letter is to set forth the response of the Republican National Committee to the complaint filed in the above caption MUR on or about July 2, 1980, and the numerous supplements thereto filed by complainants subsequent to July 2.

The Republican National Committee respectfully directs the attention of this Commission to the response filed on behalf of Ronald Reagan, Reagan For President General Election Committee, Reagan For President Committee, and the Reagan For President Compliance Fund, and states that it is in full and complete agreement with the positions set forth therein.

Complainants, at page five of their complaint, identify and describe, with reasonable accuracy, the Republican National Committee. Complainants then go on in the remaining thirty-six pages of the complaint, to mention the Republican National Committee thirteen times, twelve of these to cite past associations of individuals named in the complaint with the Republican National Committee in various capacities. Eight of the instances in which the Republican National Committee is mentioned consist of comments that certain individuals are listed in the Republican National Committee Advisory Councils Committee's Directory of July, 1979, as members of one or more of the Advisory Councils or Committees listed in that Directory. In each case, the individuals named fall squarely within the description of the Advisory Councils and Committees set forth by Chairman Bill Brock in an introduction to the Directory. In that introduction, the Advisory Councils and Committees are described as follows:

> The Republican National Committee's ten Advisory Councils and Committees were established in 1977 consisting of more than five hundred outstanding Republicans who have accepted volunteer appointments to serve their Party. These Members comprise a cross-section of the Party. They include many former Cabinet Secretaries and administration officers, Members of Congress, Governors, RNC members, business leaders, academicians, and elected state and local officials.

8304204 46

On four additional occasions where the Republican National Committee is mentioned, it is pointed out that one individual served as Chairman of the Republican National Committee from 1961-1964, that another individual served as a National Committeeman from 1968-1972, that a third individual served as General Counsel to the Republican National Committee in 1973, and that a fourth individual lists his business address as being the same as that of the Republican National Committee.

Complainants, armed with the foregoing information, then mention the Republican National Committee one final time in the Complaint, on page thirty-eight in Count IX, alleging that,

> Respondent, Republican National Committee, through its agents, has violated or will violate 2 U.S.C. §441a(d) by incurring expenses in connection with the 1980 Presidential Election greater than permitted by law.

Complainants, in amendments and supplements filed July 8, July 14, July 16, July 21, and July 22, go on to mention the Republican National Committee, on two occasions, one to show ex officio membership on the Republican National Committee and another to indicate that reports filed with the Federal Election Commission indicate that one individual receives a salary from the National Republican Congressional Committee.

At no time, either in their complaint or in the amendments or supplements thereto, do complainants cite, allege, or allude to any factual basis for the allegations set forth in Count IX of the Complaint. Instead, complainants appear, at best, to set forth some assertions of "guilt by association" or friendship for the sole and inconceivable purpose of depriving the nominees of the Republican Party of their only lawful sources of funds for the General Election. Complainants would have this Commission accept, and, further, act upon, an apparent assertion that, because the numerous individuals mentioned in the Complaint have, over a period of years from 1961-1980, chosen to exercise their rights of speech and association as active members of the Republican Party, the current Republican nominees should be denied federal funding, the conditions for which they have clearly met.

It is proferred to this Commission that, for the reasons set forth above, and, further, for those reasons set forth in the memorandum filed on behalf of Ronald Reagan, Reagan For President General Election Committee, Reagan For President Committee and Reagan For President Compliance Fund, the complaint filed in MUR 1252 should be dismissed.

Respectfully submitted,

REPUBLICAN NATIONAL COMMITTEE

Ben Cotten, General Counsel

Donald L. Ivers, House Counsel

8304042049

Copies mailed this date to:

Senator Paul Laxalt
326 Russell Senate Office Building
Washington, D.C. 20510

(For Ronald Reagan, Reagan For President, Reagan For President General Election Committee, Reagan For President Compliance Fund)

James T. Lynn, Esquire, General Counsel
Reagan For President General Election Committee
1735 I Street, N.W.
Washington, D.C. 20036

William Brock, Esquire, Chairman
Republican National Committee
310 First Street, S.E.
Washington, D.C. 20003

Americans for an Effective Presidency
In Care of Roderick M. Hills, Esquire
Messrs. Latham, Watkins, & Hills
1333 New Hampshire Avenue, N.W.
Washington, D.C. 20036

Americans for Change
In Care of Senator Harrison H. Schmitt, Chairman
218 N. Lee Street
Alexandria, Virginia 23314

North Carolina Congressional Club
In Care of John R. Bolton, Esquire
Messrs. Covington & Burling
888 16th Street, N.W.
Washington, D.C. 20006

Fund for a Conservative Majority
1022 Wilson Boulevard, Suite 1401
Arlington, Virginia 22209

National Conservative Political Action Committee
1500 Wilson Boulevard, Suite 513
Arlington, Virginia 22209

8304204350

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 7, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

William Brock
Chairman
The Republican National Committee
310 First Street, S.E.
Washington, D.C. 20003

Re: MUR 1252

Dear Mr. Brock:

This letter is to notify you that on July 2, 1980, the Federal Election Commission received a complaint which alleges that your Committee may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act") and Chapter 95 of Title 26, U.S. Code. We have numbered this matter MUR 1252. Please refer to this number in all future correspondence.

A copy of the complaint is enclosed. We understand that complainant hand delivered a copy of the complaint including exhibits to you on July 2, 1980. Therefore, we have not enclosed a copy of these extensive exhibits to the complaint. However, if you would like another copy of the exhibits, we would, of course, provide it upon request.

Under the Act, you have the opportunity to demonstrate, in writing, that no action should be taken against your Committee in connection with this matter. Your response must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

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This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

If you intend to be represented by counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

If you have any questions, please contact Marsha Gentner, the attorney assigned to this matter, at (202) 523-4057. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

Enclosures

1. Complaint
2. Procedures

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FEDERAL ELECTION COMMISSION

_____

_____

_____

_____

The above-described material was removed from this file pursuant to the following exemption provided in the Freedom of Information Act, 5 U.S.C. Section 552(b):

____	(1) Classified Information	____	(6) Personal privacy
____	(2) Internal rules and practices	____	(7) Investigatory files
____	(3) Exempted by other statute	____	(8) Banking Information
____	(4) Trade secrets and commercial or financial information	____	(9) Well Information (geographic or geophysical)
____	(5) Internal Documents		

Signed Anne Wexenbaum

Date 4/20/83

8304204[illegible]

FEC 9-21-77

Copies of Reagan speeches and advisatory material produced by AFL in response to the Commission's subpoena have not been placed on the public record for reasons of economy. They are available upon request.

FEDERAL ELECTION COMMISSION

Vendor-related documents

The above-described material was removed from this file pursuant to the following exemption provided in the Freedom of Information Act, 5 U.S.C. Section 552(b):

____	(1) Classified Information	____	(6) Personal privacy
____	(2) Internal rules and practices	____	(7) Investigatory files
____	(3) Exempted by other statute	____	(8) Banking Information
____	(4) Trade secrets and commercial or financial information	____	(9) Well Information (geographic or geophysical)
____	(5) Internal Documents		

Signed Joseph R. Wenderoth

Date 6/17/83

FEC 9-21-77

Documents related to vendors employed by AFC but not discussed in reports submitted to the Commission or in depositions have not been placed on the public record. They are available upon request. These documents were examined but not relied upon. They include copies of invoices, disbursement authorizations, checks and check stubs and memoranda.

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FEDERAL ELECTION COMMISSION

Letters from contributors and fundraisers

The above-described material was removed from this file pursuant to the following exemption provided in the Freedom of Information Act, 5 U.S.C. Section 552(b):

____	(1) Classified Information	____	(6) Personal privacy
____	(2) Internal rules and practices	____	(7) Investigatory files
____	(3) Exempted by other statute	____	(8) Banking Information
____	(4) Trade secrets and commercial or financial information	____	(9) Well Information (geographic or geophysical)
____	(5) Internal Documents		

Signed Anne A. Weissenborn

Date 6/17/83

FEC 9-21-77

The above-cited letters have not been placed on the public record for reasons of economy. Their contents were not relied upon in the Commission's consideration of this matter. The letters are available upon request.

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FEDERAL ELECTION COMMISSION

_____

_____

_____

_____

The above-described material was removed from this file pursuant to the following exemption provided in the Freedom of Information Act, 5 U.S.C. Section 552(b):

____	(1) Classified Information	____	(6) Personal privacy
____	(2) Internal rules and practices	____	(7) Investigatory files
____	(3) Exempted by other statute	____	(8) Banking Information
____	(4) Trade secrets and commercial or financial information	____	(9) Well Information (geographic or geophysical)
____	(5) Internal Documents		

Signed Grace G. Weinmann

Date 6/17/83

FEC 9-21-77

Copies of drafts of solicitation material have not been included in the public record for reasons of economy. They are available upon request.

8304042036

FEDERAL ELECTION COMMISSION

Three tapes of radio spots

The above-described material was removed from this file pursuant to the following exemption provided in the Freedom of Information Act, 5 U.S.C. Section 552(b):

____	(1) Classified Information	____	(6) Personal privacy
____	(2) Internal rules and practices	____	(7) Investigatory files
____	(3) Exempted by other statute	____	(8) Banking Information
____	(4) Trade secrets and commercial or financial information	____	(9) Well Information (geographic or geophysical)
____	(5) Internal Documents		

Signed Lane A. Ukrainian

Date 6/17/83

FEC 9-21-77

Available upon request

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FEDERAL ELECTION COMMISSION

Telephone bills - AFC and Harrison Schmidt

The above-described material was removed from this file pursuant to the following exemption provided in the Freedom of Information Act, 5 U.S.C. Section 552(b):

____	(1) Classified Information	X	(6) Personal privacy
____	(2) Internal rules and practices	____	(7) Investigatory files
____	(3) Exempted by other statute	____	(8) Banking Information
____	(4) Trade secrets and commercial or financial information	____	(9) Well Information (geographic or geophysical)
____	(5) Internal Documents		

Signed Bruce A. Washburn

Date 6/17/83

FEC 9-21-77

33040420458

FEDERAL ELECTION COMMISSION

Mailing lists with notations

Telephone lists

The above-described material was removed from this file pursuant to the following exemption provided in the Freedom of Information Act, 5 U.S.C. Section 552(b):

____	(1) Classified Information	X	(6) Personal privacy
____	(2) Internal rules and practices	____	(7) Investigatory files
____	(3) Exempted by other statute	____	(8) Banking Information
____	(4) Trade secrets and commercial or financial information	____	(9) Well Information (geographic or geophysical)
____	(5) Internal Documents		

Signed Anne G. Wissenbach

Date 4/7/83

FEC 9-21-77

8304042043

FEDERAL ELECTION COMMISSION

Copies of personalized mass mail letters and response devices

The above-described material was removed from this file pursuant to the following exemption provided in the Freedom of Information Act, 5 U.S.C. Section 552(b):

____	(1) Classified Information	X	(6) Personal privacy
____	(2) Internal rules and practices	____	(7) Investigatory files
____	(3) Exempted by other statute	____	(8) Banking Information
____	(4) Trade secrets and commercial or financial information	____	(9) Well Information (geographic or geophysical)
____	(5) Internal Documents		

Signed Anne R. Worsenbow

Date 6/17/83

FEC 9-21-77

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FEDERAL ELECTION COMMISSION

Copies of contributor response cards

The above-described material was removed from this file pursuant to the following exemption provided in the Freedom of Information Act, 5 U.S.C. Section 552(b):

____	(1) Classified Information	X	(6) Personal privacy
____	(2) Internal rules and practices	____	(7) Investigatory files
____	(3) Exempted by other statute	____	(8) Banking Information
____	(4) Trade secrets and commercial or financial information	____	(9) Well Information (geographic or geophysical)
____	(5) Internal Documents		

Signed Lorie A. Wrambow

Date 6/17/83

FEC 9-21-77

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FEDERAL ELECTION COMMISSION

Contributor Checks

The above-described material was removed from this file pursuant to the following exemption provided in the Freedom of Information Act, 5 U.S.C. Section 552(b):

____	(1) Classified Information	X	(6) Personal privacy
____	(2) Internal rules and practices	____	(7) Investigatory files
____	(3) Exempted by other statute	X	(8) Banking Information
____	(4) Trade secrets and commercial or financial information	____	(9) Well Information (geographic or geophysical)
____	(5) Internal Documents		

Signed Rose A. Wasserbon

Date 6/17/83

FEC 9-21-77

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FEDERAL ELECTION COMMISSION

Contributor Lists with notations

The above-described material was removed from this file pursuant to the following exemption provided in the Freedom of Information Act, 5 U.S.C. Section 552(b):

____	(1) Classified Information	X	(6) Personal privacy
____	(2) Internal rules and practices	____	(7) Investigatory files
____	(3) Exempted by other statute	____	(8) Banking Information
____	(4) Trade secrets and commercial or financial information	____	(9) Well Information (geographic or geophysical)
____	(5) Internal Documents		

Signed Anne B. Weissenborn

Date _____

FEC 9-21-77

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FEDERAL ELECTION COMMISSION

Routing slips

The above-described material was removed from this file pursuant to the following exemption provided in the Freedom of Information Act, 5 U.S.C. Section 552(b):

____	(1) Classified Information	____	(6) Personal privacy
____	(2) Internal rules and practices	____	(7) Investigatory files
____	(3) Exempted by other statute	____	(8) Banking Information
____	(4) Trade secrets and commercial or financial information	____	(9) Well Information (geographic or geophysical)
X	(5) Internal Documents		

Signed Rose A. Wasserman

Date 6/24/83

FEC 9-21-77

8304042045

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 31, 1983

Brice M. Clagett, Esquire
Counsel, North Carolina Congressional
Club, now the National Congressional Club
Covington and Burling
1201 Pennsylvania Avenue, N.W.
Washington, D.C. 20006

RE: MUR 1252/1299

Dear Mr. Clagett:

On May 24, 1983, the Commission determined that it will take no further action with regard to the violation of 26 U.S.C. § 9012(f) by the North Carolina Congressional Club, now the National Congressional Club.

Accordingly, the file in this matter has been closed and will become part of the public record within thirty days. Should you wish to submit any factual or legal materials to appear on the public record, please do so within ten days.

If you have any questions, please contact Anne A. Weissenborn at (202) 523-4175.

Sincerely,

Charles N. Steele
General Counsel

8304042045

COVINGTON & BURLING
1201 PENNSYLVANIA AVENUE, N. W.
P. O. BOX 7566
WASHINGTON, D. C. 20044

TELEPHONE
(202) 662-6000

WRITER'S DIRECT DIAL NUMBER
202/662-5316
202/662-5498

TWX: 710 822-0005 (CB WSH)
TELEX: 89-593 (COVLING WSH)
TELECOPIER: (202) 662-6290
CABLE: COVLING

April 13, 1983

83 APR 13 AM 10:38

Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: MUR 1252/1299

Dear Commissioners:

This is in response to the General Counsel's recommendation concerning the above-entitled MUR, that the Commission "find probable cause to believe that the National Congressional Club violated 26 U.S.C. § 9012(f) in 1980 but take no further action with regard to this particular violation." Acceptance by the Commission of the General Counsel's recommendation, in light of its prior determinations in this matter, would finally resolve this proceeding with respect to the National Congressional Club.

The National Congressional Club agrees that the Commission should take no futher action in MUR 1252/1299. Given the decision in FEC v. Americans For Change, 512 F. Supp. 489 (D.D.C. 1980), and the substantial passage of time without action by the Commission, any other result would be unwarranted and unconscionable. The National Congressional Club disagrees with the General Counsel's recommendation that the Commission find probable cause to believe that § 9012(f) was violated, and, as set forth in prior communications to the Commission in this matter, would urge that the Commission find no probable cause to believe that the National Congressional Club violated 26 U.S.C. § 9012(f).

It is inconceivable to us, particularly given the opinion in FEC v. Americans For Change, that the Commission would determine to pursue this matter further. The National Congressional Club fully reserves the right, however, if the Commission determines to take further action, to respond to the General Counsel's recommendation concerning the probable cause to believe finding and, in connection therewith, to pursue all available remedies.

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Finally, we reserve the right, should the National Congressional Club receive further indication that the Commission intends to enforce § 9012(f) prospectively, to pursue appropriate avenues of relief in connection therewith.

Respectfully submitted,

Brice M. Clagett
Scott D. Gilbert
Attorneys for
The National Congressional Club

SDG:lk

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Charles N. Steele, Esq.
General Counsel
Federal Election Commission
Seventh Floor
1325 K Street, N.W.
Washington, D.C. 20463

S. D. GILBERT
COVINGTON & BURLING
1201 PENNSYLVANIA AVENUE, N.W.
P.O. BOX 7566
WASHINGTON, D.C. 20044

Steele

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 29, 1983

Brice M. Clagett, Esquire
Counsel, North Carolina Congressional
Club, now the National Congressional Club
Covington and Burling
1201 Pennsylvania Avenue, N.W.
Washington, D.C. 20006

SENSITIVE

RE: MUR 1252/1299

Dear Mr. Clagett:

Based on complaints filed with the Commission on July 2, 1980, and September 26, 1980, the Commission determined on November 5, 1980, that there was reason to believe that your client, the North Carolina Congressional Club, had violated 26 U.S.C. § 9012(f). An investigation of this matter ensued.

After considering all the evidence available to the Commission, the Office of General Counsel is prepared to recommend that the Commission find probable cause to believe that a violation of 26 U.S.C. § 9012(f) occurred, but that no further action be taken in this regard. The Commission may or may not approve the General Counsel's recommendations.

Submitted for your review is a brief stating the positions of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies if possible) stating your positions on the issues and replying to the brief of the General Counsel. Three copies of such brief should also be forwarded to the Office of the General Counsel, again if possible. The General Counsel's brief and any brief you may submit will be considered by the Commission before proceeding to a vote.

Should you have any questions, please contact Anne A. Weissenborn at (202) 523-4175.

Sincerely,

Charles N. Steele by KAG
Charles N. Steele
General Counsel

Enclosure
Brief

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II. Legal Analysis

A. Alleged Violation of 26 U.S.C. § 9012(f)

In 1971, Congress established a system for the public financing of presidential elections. Enacted as the Presidential Election Campaign Fund Act, Pub. L. No. 92-178, 85 Stat. 573 (1971) ("the Fund Act"), this system permits individual taxpayers to participate voluntarily in the funding of presidential election campaigns by means of a $1.00 tax return check-off. Major party candidates who satisfy the eligibility requirements of 26 U.S.C. § 9003 are entitled to equal payments from the fund to defray qualified campaign expenses. Once such a candidate has chosen to accept public funds, he or she may accept private contributions only if they are necessary to make up a deficiency in the Presidential Election Campaign Fund. 26 U.S.C. §§ 9003(b)(2), 9012(b). Such candidates must also pledge not to make qualified campaign expenditures in excess of his or her allotment pursuant to 26 U.S.C. § 9004. 26 U.S.C. § 9001(b)(1). In 1980, this allotment totaled $29.4 million per major party candidate.

Congress was also concerned that the stated legislative purposes of the public financing of presidential campaigns could be undermined by the infusion of private funds into the political process in the form of independent expenditures by unauthorized committees on behalf of the presidential candidates receiving

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committees and make expenditures that were not within the limitations of the expenditures which are in the bill." 117 Cong. Rec. 42,397 (1971) (remarks of Senator Taft).

Any knowing and willful expenditures totaling in excess of $1,000 by unauthorized political committees for goods or services which would constitute qualified campaign expenses if incurred by the committee of the candidate being supported are in violation of Section 9012(f). 26 U.S.C. § 9002(1) defines "qualified campaign expense" as (A) an expense incurred by a candidate of a political party for the office of President or Vice President or by an authorized committee of such candidates "to further" their election to such offices; (B) an expense incurred within the expenditure report period of such candidates (i.e., in the present instance between the date of nomination and thirty days after the presidential election); and (C) an expense the incurring of which is not in violation of law.

On July 24, 1980, the Commission determined that Ronald Reagan, the nominee of the Republican Party for the office of President, was eligible to receive public funds pursuant to 26 U.S.C. § 9003 and certified payment to him of $29.4 million.

In 1980, the National Congressional Club was a multicandidate political committee not authorized by Ronald Reagan to make expenditures on behalf of his candidacy. During 1980, this committee reported making $3,358,796 in independent expenditures in support of Ronald Reagan's primary and general election campaigns for the office of President. Ninety percent

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Steele

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 29, 1983

SENSITIVE

Brice M. Clagett, Esquire
Counsel, North Carolina Congressional
Club, now the National Congressional Club
Covington and Burling
1201 Pennsylvania Avenue, N.W.
Washington, D.C. 20006

RE: MUR 1252/1299

Dear Mr. Clagett:

Based on complaints filed with the Commission on July 2, 1980, and September 26, 1980, the Commission determined on November 5, 1980, that there was reason to believe that your client, the North Carolina Congressional Club, had violated 26 U.S.C. § 9012(f). An investigation of this matter ensued.

After considering all the evidence available to the Commission, the Office of General Counsel is prepared to recommend that the Commission find probable cause to believe that a violation of 26 U.S.C. § 9012(f) occurred, but that no further action be taken in this regard. The Commission may or may not approve the General Counsel's recommendations.

Submitted for your review is a brief stating the positions of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies if possible) stating your positions on the issues and replying to the brief of the General Counsel. Three copies of such brief should also be forwarded to the Office of the General Counsel, again if possible. The General Counsel's brief and any brief you may submit will be considered by the Commission before proceeding to a vote.

Should you have any questions, please contact Anne A. Weissenborn at (202) 523-4175.

Sincerely,

Charles N. Steele by KAG
Charles N. Steele
General Counsel

Enclosure
Brief

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	MUR 1252/1299
The National Congressional Club	)	
	)	

GENERAL COUNSEL'S BRIEF

I. Statement of the Case

The issues involved in this matter were brought to the attention of the Commission as the result of complaints filed on July 2, 1980, and on September 26, 1980, by the Carter/Mondale Reelection Committee and the Democratic National Committee, and by Common Cause alleging violations of provisions of the Federal Election Campaign Act of 1971, as amended, and of 26 U.S.C. § 9012(f) by the North Carolina Congressional Club, later called the Congressional Club and now known as the National Congressional Club. 1/ On November 5, 1980, the Commission found reason to believe that this respondent had violated 26 U.S.C. § 9012(f) by making excessive independent expenditures on behalf of Ronald Reagan. Notification of the Commission determinations was sent to the National Congressional Club on December 3, 1980.

1/ On October 15, 1980, the two complaints were merged to form MUR 1252/1299.

2/ Earlier, on September 3, 1980, the Commission had found reason to believe that the Congressional Club had violated 2 U.S.C. § 432(e)(4) by using the name "Reagan" in the name of its self-designated project, "Citizens for Reagan in '80." On July 13, 1982, the Commission found no probable cause to believe that the respondent had violated this statutory provision.

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II. Legal Analysis

A. Alleged Violation of 26 U.S.C. § 9012(f)

In 1971, Congress established a system for the public financing of presidential elections. Enacted as the Presidential Election Campaign Fund Act, Pub. L. No. 92-178, 85 Stat. 573 (1971) ("the Fund Act"), this system permits individual taxpayers to participate voluntarily in the funding of presidential election campaigns by means of a $1.00 tax return check-off. Major party candidates who satisfy the eligibility requirements of 26 U.S.C. § 9003 are entitled to equal payments from the fund to defray qualified campaign expenses. Once such a candidate has chosen to accept public funds, he or she may accept private contributions only if they are necessary to make up a deficiency in the Presidential Election Campaign Fund. 26 U.S.C. §§ 9003(b)(2), 9012(b). Such candidates must also pledge not to make qualified campaign expenditures in excess of his or her allotment pursuant to 26 U.S.C. § 9004. 26 U.S.C. § 9001(b)(1). In 1980, this allotment totaled $29.4 million per major party candidate.

Congress was also concerned that the stated legislative purposes of the public financing of presidential campaigns could be undermined by the infusion of private funds into the political process in the form of independent expenditures by unauthorized committees on behalf of the presidential candidates receiving

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public funds. 3/ Congress recognized the potential dangers to its goals of controlling the amounts spent in presidential elections and of limiting the influence of private monies in these elections if political committee leaders could raise large numbers of contributions and use this aggregated wealth to defray expenses which would otherwise be qualified campaign expenses subject to the candidate's statutory expenditure limitation.

In order to prevent the undermining of the candidates expenditure limitations and to assure that the receipt of public funds would be a substitute for private funds, not just a supplement to those funds, Congress also included in the Fund Act a limitation of $1,000 on the amount of independent expenditures an unauthorized political committee may incur to further the election of a candidate for the office of President who is eligible to receive public funds pursuant to 26 U.S.C. § 9003. The addition of what is now Section 9012(f) was designed "to prevent any political committees from being formed as a subterfuge so that they can go beyond the authorization of the

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3/ The stated purposes of public financing were to free the candidates from the rigors of fundraising; promote public discussion of issues; restore public confidence in government; "make a major change that would be a tremendous improvement toward lifting the office of the Presidency above the power of private money to control it," 117 Cong. Rec. 41,947 (1970) (remarks by Senator Long); "take the whole presidential electoral process out of the arena of big astronomical money," 117 Cong. Rec. 42,377 (1971) (remarks of Senator Pastore); and thus "end the most flagrent single abuse of our democracy, the unconscionable power of money." 117 Cong. Rec. 41,778 (1971) (remarks of Senator Kennedy).

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committees and make expenditures that were not within the limitations of the expenditures which are in the bill." 117 Cong. Rec. 42,397 (1971) (remarks of Senator Taft).

Any knowing and willful expenditures totaling in excess of $1,000 by unauthorized political committees for goods or services which would constitute qualified campaign expenses if incurred by the committee of the candidate being supported are in violation of Section 9012(f). 26 U.S.C. § 9002(1) defines "qualified campaign expense" as (A) an expense incurred by a candidate of a political party for the office of President or Vice President or by an authorized committee of such candidates "to further" their election to such offices; (B) an expense incurred within the expenditure report period of such candidates (i.e., in the present instance between the date of nomination and thirty days after the presidential election); and (C) an expense the incurring of which is not in violation of law.

On July 24, 1980, the Commission determined that Ronald Reagan, the nominee of the Republican Party for the office of President, was eligible to receive public funds pursuant to 26 U.S.C. § 9003 and certified payment to him of $29.4 million.

In 1980, the National Congressional Club was a multicandidate political committee not authorized by Ronald Reagan to make expenditures on behalf of his candidacy. During 1980, this committee reported making $3,358,796 in independent expenditures in support of Ronald Reagan's primary and general election campaigns for the office of President. Ninety percent

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of this amount, or $3,022,916.40, was spent between July 16, 1980 and December 31, 1980, and $2,874,469.40 during Ronald Reagan's general election expenditure report period, i.e., between July 16, 1980 and December 4, 1980. These general election period expenditures purchased services from political consultants such as Arthur J. Finkelstein and Associates; paid for telephone banks and for mailing lists, printing, postage and mailing services related to direct mail solicitations; covered certain travel and rent costs; and purchased at least $283,000 in television and newspaper advertisement production and placement services in large part through the firms of MediAmerica, Inc., Jefferson Marketing and Murphy/Power Media, Inc. These expenditures, which were carried out as part of the committee's "Americans for Reagan" and "Conservatives for Reagan" projects, indicate that the National Congressional Club's 1980 activities in support of the Reagan candidacy covered the full range of campaign activities which any presidential candidate's committee would undertake if not bound by the prohibition against receipt of private contributions and the limitation on expenditures imposed upon recipients of funds from the Presidential Election Campaign Fund. The National Congressional Club solicited contributions on a nation-wide basis and used monies received to make expenditures for media advertising and other means of promoting the candidacy of Ronald Reagan. These expenditures in effect permitted the Reagan campaign to benefit from private

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contributions which it could not itself receive; they also added $3,358,796 to the $29.4 million expenditure limitation of the Reagan candidacy itself. 4/

Such receipt of private contributions and supplementation of the candidate's expenditure limitation were exactly what the National Congressional Club intended to achieve by its expenditures. This can be seen in the content of its direct mail solicitation letters. In these letters, the committee explained the general election expenditure limitation upon the candidates of the major parties and the inability of Ronald Reagan to accept private contributions. This information was used to underline the fact that the National Congressional Club saw itself as being under no expenditure limitation, to stress the importance of its planned expenditures in support of Ronald Reagan, and to urge those being solicited to contribute to the Club as a means of contributing to the Reagan campaign effort. For example, a solicitation letter apparently mailed late in the primary campaign period and bearing the signature of Senator Jesse Helms, stated in part:

> It now appears certain that Ronald Reagan will be the Republican nominee for President.... I am totally convinced that if our nation is to be rescued from the very brink of disaster on which it now hangs, then we must elect Ronald Reagan President.

4/ Although a considerable portion of this amount represented direct mail solicitation expenses, it should be noted that the direct mail pieces served as means for expressing political views in support of Ronald Reagan as well as for requesting contributions. (See attached solicitation letter for example).

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. . .

As Honorary Chairman of Americans for Reagan, I will give you an opportunity to even the odds for Governor Reagan.

As an independent campaign, Americans for Reagan can spend an unlimited amount of money on behalf of Ronald Reagan. Americans for Reagan's first goal is to purchase over $500,000 of TV time this fall in the Presidential election.

. . .

Will you help us do this?

Will you do two things today?

First, will you send Americans for Reagan, in the enclosed envelope, your maximum pledge and support of our fall campaign to buy TV time for Governor Ronald Reagan?

Second, will you match the pledge with an immediate contribution to this vital effort?

. . .

I believe that by working through this independent effort we can give Ronald Reagan a real chance at winning this fall.

His official campaign cannot take one contribution from you or from me once he has won the Republican Presidential nomination. He will have to rely on a completely independent effort. So please, send your contribution to Americans for Reagan. Do it today. (Attached as Exhibit A).

In another solicitation letter, dated July 14, 1980, and signed "Jesse", the committee stated at pages 2 and 3:

The liberals aren't going to give up easily.

8304042047 9

The news media monopoly has already begun its attack on Governor Reagan. His record and his views have been and will be distorted and twisted. Millions of dollars is being poured into a Stop Reagan campaign by the liberal establishment which has dominated this nation for so many years.

No stone will be left unturned in this massive effort to defeat and destroy Ronald Reagan and all we stand for.

Yet, Ronald Reagan will not be allowed to call on you for help to counter the lies and propaganda that could end his changes for the Presidency. The official Reagan campaign is prohibited from soliciting or accepting your contribution or mine, thanks to laws passed by the liberal Congress.

But fortunately, there is a way you can help elect Ronald Reagan -- let me explain.

Because the Reagan campaign cannot accept your contribution, we have decided to launch an independent effort to counter the liberal forces arrayed against Governor Reagan.

. . .

This election may be decided by only a few votes in key states and that's where we must put our time, effort and resources. Television spots, newspaper ads and radio commercials have already been prepared. And brochures and other campaign materials will soon be ordered.

I honestly believe that this independent campaign can mean the difference between victory or defeat for Ronald Reagan, and that is why I am asking for your help today.

. . .

...(W)on't you please dig down deep and send me at least $25 or even $50 or $100 today? (Attached as Exhibit B).

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Such solicitation of contributions and making of expenditures by an unauthorized political committee in support of a presidential candidate receiving public funds was exactly what Congress intended to limit by the promulgation of Section 9012(f). In addition, because $2,874,469.40 of the National Congressional Club's general election-related, pro-Reagan expenditures were incurred within Ronald Reagan's general election report period and would have constituted qualified campaign expenses if incurred by his authorized committees, these expenditures come squarely within the language as well as the intent of Section 9012(f), and consequently within the limitations imposed thereby.

On July 15, 1980, the Commission filed a complaint in the United States District Court for the District of Columbia pursuant to 26 U.S.C. §§ 9010(c) and 9011(b) seeking to implement and construe 26 U.S.C. § 9012(f) as applicable to three political committees. The National Congressional Club was not a party. On September 30, 1980, the three-judge court rendered its judgment and opinion, finding that "(t)he plain language of section 9012(f) proscribes categorically the defendants' planned expenditures," but also declaring 26 U.S.C. § 9012(f) to be unconstitutional. FEC v. Americans for Change, 512 F. Supp. 489, 492, 500-501 (D.D.C. 1980).

On January 19, 1982, the Supreme Court affirmed by an equally divided Court the finding by a three-judge District Court in the District of Columbia that 26 U.S.C. § 9012(f) is

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unconstitutional. Common Cause, et al. v. Harrison Schmitt, et al., No. 80-846, United States Supreme Court, consolidated with Federal Election Commission v. Americans for Change, et al., No. 80-1067, United States Supreme Court. While the Court's decision effectively closes the civil litigation in FEC v. AFC, the equally divided nature of the Court's opinion leaves the issue of the constitutionality of Section 9012(f) still unresolved and thus open. A judgment entered by an equally divided Court is not "entitled to precedential weight". Trans World Airways v. Hardison, 432 U.S. 63, 73 n.8 (1977). See also, Neil v. Biggers, 409 U.S. 188 (1972); Inman v. Baltimore and Ohio Railroad Co., 361 U.S. 138 (1959); and Ohio ex rel Eaton v. Price, 364 U.S. 263 (1960).

Given the law regarding the non-precedential nature of equally divided Supreme Court opinions, the Commission would not be barred from relitigating the issue of the enforceability of 26 U.S.C. § 9012(f). The remaining question is therefore whether or not to pursue enforcement against the National Congressional Club for its clear violation of this provision.

In the General Counsel's view, the Commission should consider that it made a strong attempt to enforce the provisions of the statute in the 1980 election. Further attempts could be made by pursuing this and other cases. In the unique circumstances, however, of a deadlocked Supreme Court on the issues as raised in the 1980 election, avoidance of further

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litigation over the same issue with regard to the election past seems to the General Counsel to be a valid exercise of the Commission's judgment in pursuing cases.

It must be emphasized that Section 9012(f) has not been declared unconstitutional by the United States Supreme Court. The National Congressional Club is thus on notice that any project or program involving more than $1,000 in expenditures on behalf of a presidential candidate receiving funds pursuant to 26 U.S.C. § 9001, et seq., in 1984 or beyond, will be undertaken in the knowledge that 26 U.S.C. § 9012(f) as enacted by Congress remains in effect.

This Office recommends that the Commission find probable cause to believe that the National Congressional Club violated 26 U.S.C. § 9012(f) in 1980 but take no further action with regard to this particular violation.

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III. General Counsel's Recommendation

1. Find probable cause to believe and take no further action with regard to the violation of 26 U.S.C. § 9012(f) by the National Congressional Club.

26 March 1983
Date

Charles N. Steele
General Counsel

Attachments - 3

8304042048

Jesse Helms
United States Senator

Exhibit A

The Capitol Building
Capitol Hill
Washington, D.C. 20510

Dear Friend:

When I began writing this letter, one of my associates commented that this may very well be the most important letter I have ever written about Ronald Reagan.

It now appears certain that Ronald Reagan will be the Republican nominee for President. I rejoice in that prospect, and I know you do also. I am totally convinced that if our nation is to be rescued from the very brink of disaster on which it now hangs, then we must elect Ronald Reagan President.

But recent events lead me to believe that perhaps this last opportunity may slip through our fingers.

If the election were held today, the polls show that Governor Reagan could defeat Jimmy Carter. But the election is not until November 4th. In the meantime, some of the most powerful forces in the country will be working to destroy Ronald Reagan's candidacy.

What are those forces?

They are the liberal news media, union bosses, liberal and left-wing politicians, institution leaders and organizations devoted to forcing socialistic programs and doctrines upon the American people.

Remember the devastating campaign that was waged by these same forces against Barry Goldwater in 1964?

They employed the most scurrilous sort of slander, libel, innuendo and falsehood to defeat Senator Goldwater. I can never forget the ruthless, brutal and unscrupulous tactics employed by those powerful forces during the 1964 campaign.

And now the liberal establishment wants to do the same thing to Ronald Reagan.

If I could choose a beginning of this effort, I would

over...

NOT PREPARED OR MAILED AT GOVERNMENT EXPENSE

Americans for Reagan, 7825 Barrett Drive, Suite 300, Dept. 24, Raleigh, NC 27609, is an independent project of the Congressional Club, and is not authorized by any presidential candidate. The foregoing material and enclosures are authorized and paid for by the Congressional Club. Thomas F. Ellis

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pinpoint the recent evening news broadcast by one of the major networks which ended with an incredibly tasteless and vicious attack on Ronald Reagan.

And even Governor Reagan's lovely wife, Nancy, has been the target of a scurrilous attack by one of the major daily newspapers.

These are just two of the opening shots in the all-out war against the candidacy of Ronald Reagan.

I will be frank with you. I am frightened. I fear very much that the awesome power of the liberal press and the broadcast kingmakers will once again succeed in deceiving the American people. But this time they must not succeed.

How are we going to fight back -- those of us who are convinced that Ronald Reagan represents perhaps the last hope of saving our nation from a long, dark night of economic and military collapse?

How do we end interest rates which have soared past 20% and inflation which exceeds 18%?

How do we end the world's ridicule of our nation and elect leaders who will not just stand by while the communist war machine advances?

There are ways we can fight back. There are ways we can keep alive the truth about Ronald Reagan and the conservative cause.

That is why I have agreed to lead a national independent effort for Governor Reagan.

As Honorary Chairman of Americans for Reagan, I will give you an opportunity to even the odds for Governor Reagan.

Although Ronald Reagan will be limited in spending this fall by federal law, you and I can help him overcome the odds by waging an independent effort through Americans for Reagan.

As an independent campaign, Americans for Reagan can spend an unlimited amount of money on behalf of Ronald Reagan. Americans for Reagan's first goal is to purchase over $500,000 of T.V. time this fall in the Presidential election.

Because the liberals control the news media, paid air time is the only way to reach the American people with the truth.

Will you help us do this?

Will you do two things today?

First, will you send Americans for Reagan, in the enclosed

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envelope, your maximum pledge and support of our fall campaign to buy T.V. time for Governor Ronald Reagan?

Second, will you match the pledge with an immediate contribution to this vital effort?

I hope you can send $25 now and promise $50 later.

Or perhaps you can send $50 now and pledge $100 later.

Whether you can send $20, $50, $75, $500 or even $1,000 right now, please let me know your decision.

This time, because our cause is so important, I am asking you to dig down deep.

Americans for Reagan must have $26,800 in the next 30 days for the television campaign -- to purchase air time for T.V. ads.

Think of the future. Think of the consequences.

What kind of future will our children and grandchildren have if 20% interest rates and 18% inflation continue?

Or even more frightening, think of the consequences if our nation continues to be ridiculed and our leaders continue to stand by as the communist war machine advances.

I believe that by working through this independent effort we can give Ronald Reagan a real chance at winning this fall.

His official campaign cannot take one contribution from you or from me once he has won the Republican Presidential nomination. He will have to rely on a completely independent effort. So please, send your contribution to Americans for Reagan. Do it today.

I am anxiously waiting to hear from you. God bless you.

Sincerely yours,

Jesse Helms

Jesse Helms
United States Senator

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U.S. Senator Jesse Helms, Honorary Chairman, AMERICANS FOR REAGAN
3825 Barrett Drive, Suite 300, Dept. 24, Raleigh, North Carolina 27609

Dear Senator Helms:

☐ Yes, I'll join your emergency effort to rescue the Reagan for President Campaign from a financial disaster that could topple America's last great hope. To help finance your independent advertising campaign for Ronald Reagan, I enclose my contribution for:

☐ $1,000 ☐ $750 ☐ $500 ☐ $300 ☐ $250 ☐ $200 ☐ $100
☐ $75 ☐ $50 ☐ $25 ☐ $15 ☐ $_____ OTHER AMOUNT

☐ No, I won't help you elect Ronald Reagan President of the United States. I understand that Ronald Reagan could lose the Presidency without my support, but I will not send you a contribution, Senator Helms.

Please make check or money order payable to AMERICANS FOR REAGAN, and type or handwrite your name and address clearly below. Thank you.

NAME_____ PHONE_____ AREA CODE_____

ADDRESS_____

CITY_____ STATE_____ ZIP_____

The Federal Election Commission requires that we ask the following.....

OCCUPATION_____

PLACE OF EMPLOYMENT_____

NOT PREPARED OR MAILED AT GOVERNMENT EXPENSE

Americans for Reagan, 3825 Barrett Drive, Suite 300, Dept. 24, Raleigh, NC 27609, is an independent project of the Congressional Club, and is not authorized by any candidate. The foregoing material and endorsement, not authorized and paid for by the Congressional Club, Thomas F. Ellis, Chairman, Custer Wells, Treasurer.

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BUSINESS REPLY MAIL
First Class Permit No 1439 Raleigh, NC

Postage Will Be Paid By

NO POSTAGE NECESSARY IF MAILED IN THE UNITED STATES

Senator Jesse Helms
Americans for Reagan
3825 Barret Drive, Suite 300, Dept. 24
Raleigh, North Carolina 27609

PR

Exhibit B

SENATOR JESSE HELMS

NATIONAL CONVENTION HEADQUARTERS - AMERICANS FOR REAGAN

July 14, 1980

Dear Friend:

I'm writing to you from the Republican National Convention in Detroit to ask you to do a special favor for me and Ronald Reagan.

This Thursday night, Ronald Reagan will deliver his speech accepting the Republican Presidential nomination to run against Jimmy Carter.

As many voters as possible must watch this event on national television.

That's why I'm asking you to call your friends and your neighbors to watch Ronald Reagan deliver his historic speech.

And as I watch Ronald Reagan speak, I will be thinking of you because you helped make his nomination possible. In fact, I share Ronald Reagan's appreciation for the support he has received from you and countless Americans like you across the nation.

From the bottom of my heart, I say thank you, and God bless you.

But your work is not over. In fact, it has just begun.

You and I face perhaps the greatest challenge of our lifetime.

The liberal Democrats and Jimmy Carter have brought this nation to the brink of disaster. Not since the Great Depression -- and perhaps not even then -- has America been so close to financial collapse.

Jimmy Carter and his allies in Congress have neglected our national defense to the point that we are becoming powerless to protect our national interests against foreign enemies. The Soviet Union knows this, and is becoming more aggressive and more reckless as its military capabilities grow and ours decline.

Can this nation we love, the United States of America, survive another four years under Jimmy Carter?

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On Tuesday, November 4, you and I and our fellow voters will decide whether we begin anew with renewed hope in the American Dream under the inspired leadership of a great American, Ronald Reagan. Or, will this nation slide into an abyss from which it will never return?

The choice you and I face is crystal clear. If not for ourselves, then for our children and for their children we must totally dedicate ourselves to the election of Ronald Reagan as President of the United States.

We must work tirelessly.

And, our prayers must be fervent on behalf of our nation.

I firmly believe that Ronald Reagan was meant for this moment in history.

By reordering our nation's priorities and balancing the federal budget, Ronald Reagan can put an end to runaway inflation, high interest rates and the debasement of our currency.

Ronald Reagan's total commitment to the security of the United States will increase our chances for peace, and insure that the United States is once again the respected leader of the free world.

But it's not going to happen unless you and I act.

The liberals aren't going to give up easily.

The news media monopoly has already begun its attack on Governor Reagan. His record and his views have been and will be distorted and twisted. Millions of dollars are being poured into a Stop Reagan campaign by the liberal establishment which has dominated this nation for so many years.

No stone will be left unturned in this massive effort to defeat and destroy Ronald Reagan and all we stand for.

Yet, Ronald Reagan will not be allowed to call on you for help to counter the lies and propaganda that could end his chances for the Presidency. The official Reagan campaign is prohibited from soliciting or accepting your contribution or mine, thanks to laws passed by the liberal Congress.

But fortunately, there is a way you can help elect Ronald Reagan -- let me explain.

Because the Reagan campaign cannot accept your contribution, we have decided to launch an independent effort to counter the liberal forces arrayed against Governor Reagan.

If you and I reach the American people with the truth about

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Ronald Reagan, he can win on November 4. If we fail, the liberals will succeed in distorting the Reagan record and Ronald Reagan will lose.

Either you and I commit ourselves to a victory for Ronald Reagan, or we will suffer a defeat from which this great nation may never recover. That's why I'm calling upon you to pledge yourself to a victory for Ronald Reagan.

This election may be decided by only a few votes in key states and that's where we must put our time, effort and resources. Television spots, newspaper ads and radio commercials have already been prepared. And brochures and other campaign materials will soon be ordered.

I honestly believe that this independent campaign can mean the difference between victory or defeat for Ronald Reagan, and that is why I am asking for your help today.

First, will you call as many friends and neighbors as possible and ask them to watch Ronald Reagan as he delivers his acceptance speech in Detroit this Thursday night?

Second, will you give the enclosed blue envelopes to some of your special friends and ask them to mail a generous check to us at AMERICANS FOR REAGAN today?

And third, won't you please dig down deep and send me at least $25 or even $50 or $100 today?

In fact, won't you please sit down right this minute and write out your check and send it back to me in the enclosed white envelope?

Time is very short.

We must begin buying television time immediately if we are to get on the air in those crucial swing states.

You and I are fighting for survival.

So please be as generous as you possibly can.

And mail your check today.

Remember, Ronald Reagan and our nation need your financial help, your efforts, and your prayers. God bless you.

Sincerely,

Terry

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 23, 1982

Douglas B. Huron, Esquire
Counsel, Carter/Mondale
Reelection Committee, Inc.
1619 New Hampshire Avenue, N.W.
Washington, D.C. 20009

RE: MURS 1252/1299
and 1316

Dear Mr. Huron:

This is in reference to the complaints filed by the Carter/Mondale Reelection Committee on July 2, 1980, and October 17, 1980, concerning violations by the North Carolina Congressional Club ("Congressional Club") of 2 U.S.C. § 432(e) and 2 U.S.C. § 441h.

Based on your client's complaints, the Commission found that there was reason to believe that the Congressional Club had violated 2 U.S.C. § 432(e)(4), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"), and instituted an investigation of these matters. After this investigation was conducted and a brief of the General Counsel was considered, the Commission concluded on July 13, 1982, that there is no probable cause to believe that the Congressional Club violated 2 U.S.C. § 432(e)(4). Accordingly, the file in MUR 1316 has been closed, as has the portion of MUR 1252/1299 related to the alleged violation by the Congressional Club of 2 U.S.C. § 432(e)(4). MUR 1316 will become part of the public record within 30 days. The remainder of MUR 1252/1299 remains open, and thus the Commission reminds you that the confidentiality provisions of 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) remain in effect as to the latter matter.

Enclosed is a copy of the brief submitted to the Commission by this Office in this matter.

Should you wish to submit any factual or legal materials to appear on the public record, please do so within 10 days. The Federal Election Campaign Act allows a complainant to seek

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judicial review of the Commission's dismissal of an action. See 2 U.S.C. § 437g(a)(8).

If you have any questions, please contact Anne A. Weissenborn, the attorney assigned to this matter, at (202) 523-4175.

Sincerely,

Charles N. Steele
General Counsel

Enclosure

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 23, 1982

Bruce M. Clagett, Esquire
Scott D. Gilbert, Esquire
Covington and Burling
1201 Pennsylvania Avenue, N.W.
Washington, D.C. 20004

RE: MURS 1252/1299
and 1316

Dear Mr. Clagett and Mr. Gilbert:

This is to advise you that after an investigation was conducted, the Commission concluded on July 13, 1982, that there is no probable cause to believe that your client, the Congressional Club, violated 2 U.S.C. § 432(e)(4). Accordingly, the file in MUR 1316 has been closed, as has the portion of MUR 1252/1299 related to an alleged violation by your client of the above statutory provision. MUR 1316 will become part of the public record within 30 days. The remainder of MUR 1252/1299 remains open, and therefore the Commission reminds you that the confidentiality provisions of 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) remain in effect.

Should you wish to submit any factual or legal materials to appear on the public record, please do so within 10 days.

If you have any questions, contact Anne A. Weissenborn at (202) 523-4175.

Sincerely,

Charles N. Steele
General Counsel

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
The Congressional Club)

MUR 1252/1299
MUR 1316

CERTIFICATION

I, Marjorie W. Emmons, Recording Secretary for the Federal Election Commission Executive Session on July 13, 1982, do hereby certify that the Commission decided by a vote of 4-2 to take the following actions in the above-captioned matter:

1. That the Commission find no probable cause to believe that the Congressional Club violated 2 U.S.C. §432(e)(4).

2. That the file in MUR 1316 be closed.

3. That the letters attached to the General Counsel's June 24, 1982 report be sent.

Commissioners Aikens, Elliott, McDonald, and McGarry voted affirmatively for the decision; Commissioners Harris and Reiche dissented.

Attest:

7-14-82
Date

Marjorie W. Emmons
Marjorie W. Emmons
Secretary of the Commission

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES N. STEELE, GENERAL COUNSEL

FROM: MARJORIE W. EMMONS/JUDY RANSOM

DATE: JUNE 28, 1982

SUBJECT: OBJECTIONS - MUR 1252/1299 and MUR 1316
. General Counsel's Report signed
June 24, 1982; Received in OCS, 6-25-82,
1:44

The above-named document was circulated to the Commission on June 28, 1982 at 11:00.

Commissioners Reiche and Harris submitted objections this date at 1:14 and 3:17, respectively.

This matter will be placed on the agenda for the Executive Session of Tuesday, July 13, 1982. A copy of Commissioner Reiche's vote sheet with comments is attached.

Attachment:
Vote sheet

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48-HOUR BALLOT

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

SENSITIVE

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

JUN 28 4 01

Date & Time Transmitted: MONDAY, 6-28-82, 11:00

COMMISSIONER: McGARRY, AIKENS, McDONALD, ELLIOTT, REICHE, HARRIS

RETURN TO COMMISSION SECRETARY BY WEDNESDAY, JUNE 30, 1982, 11:00

SUBJECT: MUR 1252/1299 and MUR 1316 - General Counsel's Report signed June 24, 1982

( ) I approve the recommendation in the attached report.

(✓) I object to the recommendation.

COMMENTS: I believe the same issue involving sub-projects of political committees arose recently in another case. I fear the public is being misled.

Date: 6/28/82 Signature: Frank P. Reiche

ALL BALLOTS MUST BE SIGNED AND DATED. PLEASE RETURN ONLY THE BALLOT TO THE COMMISSION SECRETARY. PLEASE RETURN THE BALLOT NO LATER THAN THE DATE AND TIME SHOWN ABOVE.

From the Office of the Commission Secretary

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June 25, 1982

MEMORANDUM TO: Marjorie W. Emmons

FROM: Phyllis A. Kayson

SUBJECT: MUR 1252/1299
MUR 1316

Please have the attached General Counsel's Report distributed to the Commission on a 48 hour tally basis.

Thank you.

Attachment

cc: Weissenborn

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SENSITIVE

BEFORE THE FEDERAL ELECTION COMMISSION

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY
82 JUN 25 P 1:44

In the Matter of)
) MUR 1252/1299
The Congressional Club) MUR 1316

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On September 3, 1980, the Commission found, with regard to MUR 1252, that there was reason to believe that the Congressional Club ("the Committee") had violated 2 U.S.C. § 432(e)(4) by using the name "Reagan" in "Americans for Reagan", a self-designated "project" of the Committee. The same finding was made later on March 21, 1981, with regard to MUR 1316 which involves the use of "Americans for Reagan" in a disclaimer provided at the conclusion of a television advertisement paid for by the Congressional Club. Both of these findings resulted from complaints filed by the Carter/Mondale Reelection Committee.

Following investigation of these issues, a brief was sent to the Commission by this Office on May 10, 1982, recommending a finding of no probable cause to believe that the Congressional Club violated 2 U.S.C. § 432(e)(4). A copy of this brief was sent to counsel for the Congressional Club on that same date.

II. LEGAL ANALYSIS

Counsel for the respondent has not submitted a reply brief in these matters. The OGC brief of May 10, 1982 contains this Office's legal analysis of the issue involved; no information has been received in the interim to modify this analysis.

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It should be noted that acceptance of the recommendation below will close MUR 1316 but pertains to only one aspect of the Congressional Club's involvement in MUR 1252/1299. Therefore, the Committee will remain a respondent in the latter matter.

III. RECOMMENDATIONS

1. That the Commission find no probable cause to believe that the Congressional Club violated 2 U.S.C. § 432(e)(4).

2. That the file in MUR 1316 be closed.

3. That the attached letters be sent.

24 June 1982
Date

Charles N. Steele
General Counsel

Attachments

Letter to counsel for respondent
Letter to counsel for complainant

8304042050 1

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Bruce M. Clagett, Esquire
Scott D. Gilbert, Esquire
Covington and Burling
1201 Pennsylvania Avenue, N.W.
Washington, D.C. 20004

RE: MURS 1252/1299
and 1316

Dear Mr. Clagett and Mr. Gilbert:

This is to advise you that after an investigation was conducted, the Commission concluded on June , 1982, that there is no probable cause to believe that your client, the Congressional Club, violated 2 U.S.C. § 432(e)(4). Accordingly, the file in MUR 1316 has been closed, as has the portion of MUR 1252/1299 related to an alleged violation by your client of the above statutory provision. MUR 1316 will become part of the public record within 30 days. The remainder of MUR 1252/1299 remains open, and therefore the Commission reminds you that the confidentiality provisions of 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) remain in effect.

Should you wish to submit any factual or legal materials to appear on the public record, please do so within 10 days.

If you have any questions, contact Anne A. Weissenborn at (202) 523-4175.

Sincerely,

Charles N. Steele
General Counsel

8304042050

(1)

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Douglas B. Huron, Esquire
Counsel, Carter/Mondale
Reelection Committee, Inc.
1619 New Hampshire Avenue, N.W.
Washington, D.C. 20009

RE: MURS 1252/1299
and 1316

Dear Mr. Huron:

This is in reference to the complaints filed by the Carter/Mondale Reelection Committee on July 2, 1980, and October 17, 1980, concerning violations by the North Carolina Congressional Club ("Congressional Club") of 2 U.S.C. § 432(e) and 2 U.S.C. § 441h.

Based on your client's complaints, the Commission found that there was reason to believe that the Congressional Club had violated 2 U.S.C. § 432(e)(4), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"), and instituted an investigation of these matters. After this investigation was conducted and a brief of the General Counsel was considered, the Commission concluded on June , 1982, that there is no probable cause to believe that the Congressional Club violated 2 U.S.C. § 432(e)(4). Accordingly, the file in MUR 1316 has been closed, as has the portion of MUR 1252/1299 related to the alleged violation by the Congressional Club of 2 U.S.C. § 432(e)(4). MUR 1316 will become part of the public record within 30 days. The remainder of MUR 1252/1299 remains open, and thus the Commission reminds you that the confidentiality provisions of 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) remain in effect as to the latter matter.

Should you wish to submit any factual or legal materials to appear on the public record, please do so within 10 days. The Federal Election Campaign Act allows a complainant to seek judicial review of the Commission's dismissal of an action. See 2 U.S.C. § 437g(a)(8).

(2)

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If you have any questions, please contact Anne A. Weissenborn, the attorney assigned to this matter, at (202) 523-4175.

Sincerely,

Charles N. Steele
General Counsel

8304042050

May 10, 1982

MEMORANDUM TO: Marjorie Emmons

FROM: Steven Barndollar

SUBJECT: MURs 1252/1299 and 1316

Please have the attached Memo and Brief distributed to the Commission on a 24 hour informational basis. Thank you.

Attachment

8304042050

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 10, 1982

Brice M. Clagett, Esq.
Scott D. Gilbert, Esq.
Covington and Burling
888 Sixteenth Street, N.W.
Washington, D.C. 20006

RE: MURS 1252/1299 and 1316

Dear Mr. Clagett and Mr. Gilbert:

Based on complaints filed with the Commission on July 2, 1980, and October 17, 1980, the Commission determined on September 3, 1980, and March 25, 1981, that The North Carolina Congressional Club, now The Congressional Club, had violated 2 U.S.C. § 432(e)(4), a provision of the Federal Election Campaign Act of 1971, as amended. An investigation was instituted.

After considering all the evidence available to the Commission, the Office of General Counsel is prepared to recommend that the Commission find no probable cause to believe that violations have occurred. The Commission may or may not approve the General Counsel's Recommendation.

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of these cases. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies if possible) stating your position on the issues and replying to the brief of the General Counsel. Three copies of such brief should also be forwarded to the Office of General Counsel, if possible. The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of no probable cause to believe a violation has occurred.

Should you have any questions, please contact Anne Weissenborn at (202) 523-4175.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Brief

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SENSITIVE

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

82 MAY 10 A10: 27

May 10, 1982

MEMORANDUM

TO : The Commission

FROM : Charles N. Steele
General Counsel

SUBJECT: MURS 1252/1299 and 1316

Attached for the Commission's review is a brief stating the position of the General Counsel on the legal and factual issues concerning The Congressional Club in the above-captioned matters. A copy of this brief and a letter notifying the Respondent of the General Counsel's intent to recommend to the Commission a finding of no probable cause to believe was mailed on [redacted] , 1982. Following receipt of the Respondent's reply to this notice, this Office will make a further report to the Commission.

Attachments

1. Brief
2. Letter to Respondent

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 10, 1982

Brice M. Clagett, Esq.
Scott D. Gilbert, Esq.
Covington and Burling
888 Sixteenth Street, N.W.
Washington, D.C. 20006

RE: MURS 1252/1299 and 1316

Dear Mr. Clagett and Mr. Gilbert:

Based on complaints filed with the Commission on July 2, 1980, and October 17, 1980, the Commission determined on September 3, 1980, and March 25, 1981, that The North Carolina Congressional Club, now The Congressional Club, had violated 2 U.S.C. § 432(e)(4), a provision of the Federal Election Campaign Act of 1971, as amended. An investigation was instituted.

After considering all the evidence available to the Commission, the Office of General Counsel is prepared to recommend that the Commission find no probable cause to believe that violations have occurred. The Commission may or may not approve the General Counsel's Recommendation.

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of these cases. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies if possible) stating your position on the issues and replying to the brief of the General Counsel. Three copies of such brief should also be forwarded to the Office of General Counsel, if possible. The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of no probable cause to believe a violation has occurred.

Should you have any questions, please contact Anne Weissenborn at (202) 523-4175.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Brief

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 1252/1299
The Congressional Club) MUR 1316

GENERAL COUNSEL'S BRIEF

I. Statement of Case

The issue involved in these matters which is the subject of this brief was brought to the attention of the Commission in two separate complaints filed by the Carter/Mondale Reelection Committee, Inc., on July 2, 1980 (MUR 1252) and October 17, 1980 (MUR 1316).

On September 3, 1980, the Commission found, with regard to MUR 1252, that there was reason to believe that the North Carolina Congressional Club, now the Congressional Club ("the Committee") had violated 2 U.S.C. § 432(e)(4) by using the name "Reagan" in "Americans for Reagan", a self-styled "project" of the Committee. Later, on March 25, 1981, the Commission made the same finding, in this instance with regard to the use of "Americans for Reagan" in a disclaimer provided at the conclusion of a television advertisement paid for by the Committee. Notifications of the Commission's determination were sent to the Committee, as was a subpoena for documents and an order for answers to written questions. On November 3, 1980, November 25, 1980, February 20, 1981, and June 8, 1981, counsel for the Committee submitted responses. (See Attachments 1, 2, 3 and 4).

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II. Legal Analysis

2 U.S.C. § 432(e)(4) states in part, "In the case of any political committee which is not an authorized committee, such

political committee shall not include the name of any candidate in its name."

The complaint involved in MUR 1252 alleged that the Committee had violated Section 432(e)(4) in that its "project", "Americans for Reagan", is a "discrete, unauthorized political committee which (has) included the name Reagan in (its) name." In MUR 1316, the complaint concerned a television commercial aired on WJLA-TV in Washington, D.C., the authorization line of which read

> Paid for by Americans for Reagan Congressional Club
> and Not Authorized by Any Presidential Candidate.

The second complaint alleged that "(t)he use by a purportedly unauthorized committee of the name of the candidate it is supporting in the committee name is prohibited by FEC regulations. 2 U.S.C. § 432(e)."

In the response filed by counsel for the Committee on June 8, 1981, it is stated that the Congressional Club's chairman, Thomas F. Ellis, and the treasurer, Carter Wrenn, "determined that the Congressional Club would make independent expenditures in support of then-Governor Reagan's presidential campaign." In order to prevent confusion with other Club activities, these independent expenditure projects were labeled "Americans for Reagan" and "Conservatives for Reagan", each designation being related to one of two advertising firms handling production of particular communications. (Attachment 4, page 2).

According to counsel, "...all communications made in connection with the Congressional Club's independent expenditure projects Americans for Reagan and Conservatives for Reagan, were

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authorized solely by the Congressional Club and financed solely with Congressional Club funds drawn on the Congressional Club's bank accounts. Likewise, all contributions received as a result of these communications were received at the mailing address solely of the Congressional Club and were deposited in bank accounts held solely in the name of the Congressional Club." (Attachment 4, page 6). In view of these assertions by counsel, an independent study has been undertaken by the Office of General Counsel of the Committee's reports of receipts and expenditures. These reports show that contributions made by certain political action committees to Americans for Reagan or Conservatives for Reagan were reported as receipts by the Committee. (See Attachments 5 and 6 for examples). These same Committee reports disclose numerous independent expenditures made by the Committee on behalf of the candidacy of Ronald Reagan; there is, however, no indication that such expenditures were made by entities designated "Americans for Reagan" or "Conservatives for Reagan".

Counsel argues that the prohibition against use of a candidate's name found at 2 U.S.C. § 432(e)(4) applies only to unauthorized political committees and that Americans for Reagan and Conservatives for Reagan were not political committees for purposes of this provision. Counsel cites the definition of "political committee" at 2 U.S.C. § 431(4)(A), which is interpreted as applying "(1) only to a 'committee, club, association, or other groups of persons', and (2) only if such a group 'receives contributions' or 'makes expenditures' in excess of $1,000." Counsel then argues that these requirements are not met in this

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case because "there exists no association or group of persons other than the Congressional Club that properly can be considered a respondent in this proceeding. Within the context of the Act and regulations, Americans for Reagan and Conservatives for Reagan do not exist. They are merely phrases used by the Congressional Club to label two of its independent projects." (Attachment 4, page 8). "As non-entities, Americans for Reagan and Conservatives for Reagan had neither the funds to expend nor the capability of expending anything." (Attachment 4, page 9). Regarding the receipt of contributions, "it is clear that the Congressional Club was the only entity that received contributions with regard to Americans for Reagan and Conservatives for Reagan, and that the Congressional Club is the only political committee before the Commission in this proceeding." (Attachment 4, page 10).

This Office has determined that because the language of both 2 U.S.C. § 432(e)(4) and the Commission's implementing regulation, 11 C.F.R. § 102.14(a), refers only to the names of political committees, it would be difficult to sustain the inference that it also applies to the use by such committees of a candidate's name in other contexts. Therefore, in order to find that 2 U.S.C. § 432(e)(4) was violated as regards the television advertisement at issue in MUR 1316 and the broader range of communications involved in MUR 1252/1299, it would appear to be necessary to determine that Americans for Reagan and/or Conservatives for Reagan met the definition of a "political committee" at the time these names were used.

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According to the Committee's counsel, there has existed no group of persons involved with the activities here at issue which can be designated "Americans for Reagan" or "Conservatives for Reagan". Only Congressional Club staff, bank accounts and other records have allegedly been involved in the receipt and expenditure of funds undertaken as activities bearing those titles. This Office is in possession of no information to the contrary. It could perhaps be argued that by using only the terms "Americans for Reagan" or "Conservatives for Reagan", and not "The Congressional Club" in letterheads used for communications, the Congressional Club in fact employed those names as aliases, thereby raising them to the level of alternative names of the Committee rather than projects. However, as counsel has indicated, the copies of such communications submitted to the Commission in response to its subpoena and also as attachments to responses from counsel all contain written disclaimers stating that the communications involved were authorized and paid for by the Congressional Club and, in most cases, stating that "Americans for Reagan" or "Conservatives for Reagan" was a "project" of the Congressional Club. Therefore, it seems that the Committee did not present itself to the public under more than one name, but, rather, explicitly made the Congressional Club the principal entity. Given these facts, neither "Americans for Reagan" nor "Conservatives for Reagan" appears to meet the definition of "political committee" set forth at 2 U.S.C. § 431(4)(A), and therefore it would appear

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that the provisions of 2 U.S.C. § 432(e)(4) are not applicable to those terms. 1/ Therefore, this Office recommends that the Commission find no probable cause to believe that the Congressional Club has violated 2 U.S.C. § 432(e)(4).

1/ Counsel, citing 2 U.S.C. § 438(e), argues that the Congressional Club, when deciding upon the titles "Americans for Reagan" and Conservatives for Reagan" relied upon the language of 2 U.S.C. § 432(e)(4) and 11 C.F.R. § 102.14(a) with their references to "political committees", upon the definition of "political committee" found at 2 U.S.C. § 431(4)(A), and upon the requirements for disclaimers found at 11 C.F.R. § 110.11(a)(1). Counsel also argues that an application of Section 432(e)(4) to the Congressional Club's fund-raising projects, in spite of the statutory reference to political committees, would render that provision "overly vague and unduly broad, and violative of both the First and Fifth Amendments." Finally, counsel argues that a prohibition upon the use of a candidate's name in such situations would be "an impermissible restraint on the exercise by the Congressional Club of its First Amendment rights." (Attachment 4, pages 14-15). Given the determination by this Office that "Americans for Reagan" and "Conservatives for Reagan" do not meet the statutory requirements of a "political committee", it is not necessary to reach the additional statutory and constitutional issues raised.

Counsel states that the portions of the disclaimers included in the Committee's communications which involved the status of Americans for Reagan and Conservatives for Reagan were not required by either the Federal Election Campaign Act or by the Commission's regulations; however, such a statement is not entirely accurate as regards any communications which solicited funds. 11 C.F.R. § 110.11(a)(1)(iii) requires that unauthorized solicitations "state that the communication is not authorized by any candidate or candidate's committee." Counsel also erroneously assumes that the Commission did not view the disclaimer contained in the television advertisement at issue in MUR 1316 during its consideration of whether or not a violation of 2 U.S.C. § 441d(a)(3) on the part of the Congressional Club had occurred.

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III. General Counsel's Recommendations

1. Find no probable cause to believe that the Congressional Club violated 2 U.S.C. § 432(e)(4).

2. Close the file in MUR 1316.

4 May 1982
Date

Charles N. Steele
General Counsel

Attachments

1. Letter from counsel dated November 3, 1980.
2. Letter from counsel dated November 25, 1980.
3. Letter from counsel dated February 20, 1981.
4. Letter from counsel dated June 8, 1981.
5. Reports of disbursements to and receipts by the Congressional Club of contributions to Americans for Reagan (2 pages).
6. Reports of disbursements to and receipts by the Congressional Club of contributions to Conservatives for Reagan and Americans for Reagan (4 pages).

8304042051

COVINGTON & BURLING
888 SIXTEENTH STREET, N.W.
WASHINGTON, D.C. 20006

TELEPHONE
(202) 452-6000

WRITER'S DIRECT DIAL NUMBER
(202) 452-6418

TWX: 710-822-0006
TELEX: 89-593
CABLE: COVLING

80 NOV 26 P3:34

ATTACHMENT 2

HAND DELIVERED

November 25, 1980

Charles N. Steele, Esq.
General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: Matters Under Review 1252 and 1299

Dear Mr. Steele:

This letter is in response to the subpoena to produce certain documents and materials and to answer written questions issued by the Federal Election Commission ("FEC") to the Congressional Club.

We provide the following written responses to the two document-production items:

1. There are no documents "concerning or relating to the formation, organization, planning or undertaking of Americans for Reagan" because that project was only an aspect of the Congressional Club's political activity. See response to Interrogatory A(1), infra.

2. Before responding to this item, we would like a statement from the FEC concerning the need for it to examine the contents of political advertisements.

We provide the following responses to the FEC's interrogatories:

A. Americans for Reagan is a project of the Congressional Club.

(1) Americans for Reagan was never "organized" or "formed". The first fundraising letter was dated April 30, 1980.

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(2) Americans for Reagan maintains no bank accounts or accounting of receipts and expenditures separate and apart from the Congressional Club.

(3) Americans for Reagan does not employ a staff, separate and apart from that of the Congressional Club.

(4) See response to document production request Two, supra.

(5) Monies from checks received by the Congressional Club made payable to the Congressional Club were used in the Americans for Reagan project.

(6) "Congressional Club" is the name of the account.

B. Thomas F. Ellis, Chairman of the Congressional Club; Carter Wrenn, Treasurer of the Congressional Club.

If you have any further questions in this matter, please let me know. We believe that the foregoing responses vividly demonstrate that Americans for Reagan is a project of the Congressional Club. Accordingly, there can be no violation of 2 U.S.C. § 432(e)(4) or any other provision of the Federal Election Campaign Act, as amended. We believe these MURs should be dismissed forthwith.

Sincerely yours,

John R. Bolton

John R. Bolton

Enclosures

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Weissenborn

ATTACHMENT 3

COVINGTON & BURLING
888 SIXTEENTH STREET, N. W.
WASHINGTON, D. C. 20006

TELEPHONE
(202) 452-6000

WRITER'S DIRECT DIAL NUMBER
(202) 452-4766

TWX: 710-822-0005
TELEX: 89-593
CABLE: COVLING

RECEIVED
FEDERAL ELECTION COMMISSION
GENERAL COUNSEL
'81 FEB 20 P4:41

February 20, 1981

BY HAND

Anne Weissenborn, Esq.
Office of the General Counsel
Federal Election Commission
1325 K Street, N.W.
7th Floor
Washington, D.C. 20463

Dear Ms. Weissenborn:

Pursuant to our agreement, as confirmed by my letter of February 13, 1981, I am submitting herewith copies of the documents in the possession of the Congressional Club that were used to solicit funds with respect to the project Americans For Reagan. Any markings that would tend to identify the potential recipients of such documents have been deleted. In the event that the Congressional Club discovers additional responsive documents in its possession, it will supplement this submission accordingly.

With respect to Interrogatory A-4, the Congressional Club supplements its response of November 25, 1980, as follows: Some solicitations or requests for contributions to Americans For Reagan requested that checks be made payable to the Congressional Club; other solicitations or requests for contributions to Americans For Reagan requested that checks be made payable to Americans For Reagan; and other solicitations or requests for contributions to Americans For Reagan did not specify the payee.

If you have any futher questions, please let me know.

Sincerely,

Scott D. Gilbert

SDG/dg

Enclosure

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ATTACHMENT 4

COVINGTON & BURLING
888 SIXTEENTH STREET, N. W.
WASHINGTON, D. C. 20006

TELEPHONE
(202) 452-6000

WRITER'S DIRECT DIAL NUMBER
(202) 452-4766

TWX: 710-822-0005
TELEX: 89-593
CABLE: COVLING

June 8, 1981

FEC MAIL ROOM
81 JUN 8 P12:38

Anne A. Weissenborn, Esq.
Office of General Counsel
Federal Election Commission
1325 K Street, N.W., 7th Floor
Washington, D.C. 20463

Re: MUR 1316

Dear Ms. Weissenborn:

Enclosed please find two copies of the Congressional Club's response in the above-entitled MUR.

Please call me if you have any further questions.

Sincerely,

Scott D. Gilbert by DAG

Scott D. Gilbert

SDG/dg

Enclosure

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Weissenborn

GCC # 3323

ATTACHMENT 1

COVINGTON & BURLING
888 SIXTEENTH STREET, N. W.
WASHINGTON, D. C. 20006

TELEPHONE
(202) 452-6000
WRITER'S DIRECT DIAL NUMBER
(202) 452-6418

TWX: 710-822-0005
TELEX: 89-593
CABLE: COVLING

HAND DELIVERED

November 3, 1980

Anne Weissenborn, Esq.
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

10 NOV 3 P3:09

Re: MUR 1316

Dear Ms. Weissenborn:

As I have indicated to you during several telephone conversations, I am presently in trial before the United States District Court for the Western District of Oklahoma. We have just completed our eighth week of trial, and there is no end in sight. Indeed, we have already begun discussions before the Court concerning the scheduling of witnesses by opposing counsel for the week of December 15. It now appears, however, that the trial will recess during the period around the Thanksgiving holiday. Accordingly, I request an extension of time within which to respond to the Carter-Mondale Reelection Committee, Inc. complaint until November 28.

I would, however, like to comment briefly now on the Carter-Mondale complaint. It is clear that the complaint attacks the substance of a particular Congressional Club advertisement. As such, the complaint is a thinly-veiled invitation to the Federal Election Commission to engage in censorship of political speech. The allegations that the Federal Election Campaign Act, as amended, ("FECA") has been violated, are, at best, window-dressing. The true thrust of the complaint is revealed in its next-to-last paragraph, where Carter-Mondale state that they "are calling on stations not to run these misleading advertisements." Carter-Mondale's real purpose is not to raise an issue of law, but to suppress the advertisements. The First Amendment obviously precludes this Commission from being a party to such an effort.

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Carter-Mondale's actual intent is itself strong evidence of the speciousness of the complaint. For instance, as to the allegation that the advertisements violate 2 U.S.C. § 441h, Carter-Mondale has ignored the joint public notice by this Commission and the Federal Communications Commission ("FCC") concerning FCC rules on sponsorship identification and FEC requirements for candidate authorization. CCH Fed. Elec. Camp. Fin. Guide ¶ 9059. The Carter-Mondale complaint contains no allegation that the requirements of the joint FEC-FCC notice have been violated..

Moreover, as that joint notice makes plain, under FCC rules, "liability for incorrect sponsorship identification rests with the [broadcast] licensee." Id. at n. 2. The fact that the advertisement has been run strongly supports the argument that the advertisement complied with the applicable FCC rules and also strongly supports the argument that no violation of 2 U.S.C. § 441h has occurred. Indeed, Section 441h, by its own terms, is inapplicable here. That provision covers candidates for Federal office or the employees or agents of such a candidate. The Congressional Club is neither a candidate nor the agent or employee of a candidate.

The Congressional Club has addressed allegations by Carter-Mondale concerning 2 U.S.C. § 432(e)(4) in MURs 1252 and 1299. We will be making a further response on those issues on November 21, assuming that the Commission grants our request for an extension of time to respond to a subpoena containing certain written questions and requesting the production of documents.

Sincerely yours,

J. R. Bolton

John R. Bolton

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UNITED STATES OF AMERICA
BEFORE THE FEDERAL ELECTION COMMISSION

IN RE THE CONGRESSIONAL CLUB) MUR 1316

RESPONSE OF THE CONGRESSIONAL CLUB

This memorandum is submitted on behalf of the Congressional Club in response to the finding of the Federal Election Commission ("Commission") in the above-entitled matter that there is reason to believe the Congressional Club violated 2 U.S.C. § 432(e)(4) by including the name of a candidate in the title of its project Americans For Reagan. As shown by the Congressional Club's submissions in MURs 1252 and 1299, and as demonstrated below, there is no basis in either law or fact to support the complainants' contentions in this regard. Accordingly, the complaint in MUR 1316 and those portions of the complaint in MURs 1252 and 1299 that allege a violation by the Congressional Club of 2 U.S.C. § 432(e)(4) should be dismissed.

STATEMENT OF FACTS

The Congressional Club is a multicandidate political committee, as that term is defined in the Federal Election Campaign Act ("Act"), and is duly registered with the Commission. Thomas F. Ellis serves as the Chairman of the Congressional Club and its Treasurer is Carter Wrenn. Senator Jesse Helms serves as Honorary Chairman.

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In early 1980, Mr. Ellis and Mr. Wrenn determined that the Congressional Club would make independent expenditures in support of then-Governor Reagan's presidential campaign, in both the primary and general election periods. As part of this endeavor, the Congressional Club sponsored mass mailings and various advertisements, intended to engender voter support for Mr. Reagan and to solicit funds to enable the Congressional Club to continue to make such expenditures. All monies received by the Congressional Club in connection with this activity were deposited in bank accounts held solely in the name of the Congressional Club, and all funds used to finance these communications were drawn from these accounts.

In order to distinguish these independent expenditure projects from other previous and ongoing projects undertaken by the Congressional Club -- both to avoid confusion among members of the public and for internal organization purposes -- Mr. Ellis and Mr. Wrenn decided to label these independent expenditure efforts in a manner that clearly would identify them as such. Accordingly, after consultation with commercial advertising firms and careful deliberation, the Congressional Club's independent expenditure projects were entitled "Americans For Reagan" and "Conservatives For Reagan", depending upon which one of two advertising firms was producing the particular communications. These phrases appeared in all of the communications produced in connection with these projects: in the case of mailings, as part of or in place of the Congressional Club letterhead, or in

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the body of a particular letter;*/ and, in the case of the particular advertisement at issue here, as part of the disclaimer at the end of the broadcast.

The Congressional Club took great care, however, to ensure that the recipients or viewers of these communications were made aware that Americans For Reagan and Conservatives For Reagan were projects of the Congressional Club and were not associated with any other political or candidates' committees. There were two reasons for this: 1) the Congressional Club highly values the reputation it has earned as an effective and loyal supporter of the political philosophy embodied by President Reagan and numerous segments of both major political parties, and Mr. Ellis and Mr. Wrenn wanted the Congressional Club's supporters and other members of the general public to be aware of its continued efforts in this regard on behalf of then-Governor Reagan; and 2) Mr. Ellis and Mr. Wrenn wanted to ensure full compliance with the Act and the regulations of the Commission in order not to jeopardize either the Reagan campaign or the Congressional Club's status as a viable political committee.**/

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*/ Some such letters had no letterhead; others bore the letterhead of Senator Helms or Mr. Wrenn; in others, the phrases Conservatives For Reagan and Americans For Reagan were combined with the letterheads of Senator Helms or Mr. Wrenn; and, in still others, the phrases Americans For Reagan and Conservatives For Reagan stood alone.

**/ See, e.g., 2 U.S.C. § 441d(a) and 11 C.F.R. § 110.11(a), which require a disclaimer to appear in communications that solicit contributions or expressly advocate the election or defeat of a clearly identified candidate.

Therefore, in the body of many of the letters distributed in connection with Americans For Reagan and Conservatives For Reagan, there were numerous statements that explained to the recipient the independent nature and purpose of these projects. Indeed, the first piece of literature mailed by the Congressional Club as part of its independent expenditure effort explained:

> This is the beginning of the Congressional Club's independent expenditure campaign to promote Governor Ronald Reagan for President. (An independent expenditure campaign is an effort which is not coordinated with the candidate or his principle campaign commitee.)
>
> * * *
>
> This independent campaign is one of several of the Club's projects this year to help Senator Helms promote conservative candidates and causes. (emphasis added)*/

Other letters, some of which were sent under the letterheads Americans For Reagan and Conservatives For Reagan, included statements like:

> Did you know federal law prevents Ronald Reagan from raising money?
>
> The only money he can spend is the money the government is going to give him after the convention.
>
> But, did you also know friends and supporters of a Presidential candidate can spend as much money as they want to help him get elected?

---

*/ Memorandum from Carter Wrenn to Helms Supporters dated March 7, 1980, attached hereto as Appendix A.

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> And, that if you've sent any money to Ronald Reagan up to now, it doesn't count towards the $5,000 limit you have through an independent campaign?
>
> * * *
>
> Because of the 1974 Federal Election Law, Governor Reagan cannot ask you himself to send money to help him defeat President Carter this November.
>
> However, since many liberal supporters of President Carter will be raising and spending money independent of the Carter campaign, shouldn't you and I be raising and spending money independent of Governor Reagan's campaign to help elect him President?
>
> Because this independent effort is being made without contacting Governor Reagan or any of his campaign aides, you can contribute up to $5,000 to the Congressional Club (instead of the $1,000 limit if you had sent the money directly to the Reagan campaign.) (emphasis added)*/

Moreover, pursuant to the explicit directives of Mr. Wrenn, substantially all such mailings included a clear disclaimer that contained the following language:

> [Americans/Conservatives] For Reagan is an independent project of the Congressional Club and is not authorized by any presidential candidate. The foregoing materials and enclosures, are authorized and paid for by the Congressional Club, Thomas F. Ellis, Chairman; Carter Wrenn, Treasurer.

Similarly, the television advertisement in question here ended with the clearly legible statement:

> Paid for by Americans For Reagan/ Congressional Club. Not authorized by any Presidential candidate.

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*/ See, e.g., letter dated September 22, 1980, attached hereto as Appendix B.

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This disclaimer was included despite the fact that this particular communication did not contain any instances of express advocacy or of solicitations for contributions and thus the disclaimer was not required under either the Act or the regulations. The sole reason for its inclusion was to effectuate the objectives described above, namely, to underscore once again that this Congressional Club project had no connection whatsoever with any other political or candidates' committees.

It bears emphasis that all communications made in connection with the Congressional Club's independent expenditure projects Americans For Reagan and Conservatives For Reagan were authorized solely by the Congressional Club and financed solely with Congressional Club funds drawn on the Congressional Club's bank accounts. Likewise, all contributions received as a result of these communications were received at the mailing address solely of the Congressional Club and were deposited in bank accounts held solely in the name of the Congressional Club.

Because then-Governor Reagan's name appeared in the title of the Congressional Club's project Americans For Reagan, however, the Congressional Club was named as a respondent in complaints filed with the Commission by the Carter/Mondale Reelection Committee, Inc. (MURs 1252, 1316) and Common Cause (MUR 1292), all of which allege a violation by the Congressional Club of 2 U.S.C. § 432(e)(4), which prohibits an unauthorized political committee from including in its name the name of a candidate. These thinly veiled, politically motivated attempts

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to halt legitimate support of the Reagan campaign had no colorable basis when originally filed, and have no more merit now. As shown above, there simply is no factual basis to support the allegations that the Congressional Club violated 2 U.S.C. § 432(e)(4), and these matters should be dismissed.

ARGUMENT

I. The Congressional Club Did Not Violate Either the Letter or the Spirit of 2 U.S.C. § 432(e)(4).

A. The Congressional Club's Independent Projects Are Not Political Committees and Are Not Subject to 2 U.S.C. § 432(e)(4).

2 U.S.C. § 432(e)(4) provides in relevant part that "[i]n the case of any political committee which is not an authorized committee, such political committee shall not include the name of any candidate in its name." Accord, 11 C.F.R. § 102.14(a). Thus, by its very terms, this prohibition applies only to the names of political committees; it does not -- and indeed, without raising serious constitutional questions, could not -- purport to regulate the use of a candidate's name in any other context. It is clear that the Congressional Club's independent projects Americans For Reagan and Conservatives For Reagan are not political committees, as that term is defined in the Act and Commission's regulations.

2 U.S.C. § 431(4)(A) defines the term "political committee" to mean:

> Any committee, club, association, or other group of persons which receives contributions aggregating in excess of $1,000

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during a calendar year or which makes expenditures aggregating in excess of $1,000 during a calendar year.

Accord, 11 C.F.R. § 100.5(a).*/ This is a precise definition and must be applied with care, because in many cases it is the only standard by which members of the public can decide whether their committees, groups or organizations are subject to the jurisdiction of the Commission, and whether to conform their activities to the registration and reporting requirements and other limitations of the Act and regulations. In enacting § 431 (4)(A), Congress determined that the term "political committee" will apply 1) only to a "committee, club, association, or other groups of persons", and 2) only if such a group "receives contributions" or "makes expenditures" in excess of $1,000. These requirements simply are not met in the instant case.

First, there exists no association or group of persons other than the Congressional Club that properly can be considered a respondent in this proceeding. Within the context of the Act and regulations, Americans For Reagan and Conservatives For Reagan do not exist. They are merely phrases used by the Congressional Club to label two of its independent projects.**/

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*/ The Act and regulations also define "political committee" in terms of separate segregated funds and local committees of political parties. See, 2 U.S.C. § 431(4)(B),(C); 11 C.F.R. § 100.5(b),(c). These definitions have no possible application to this matter and we do not address them here.

**/ That the Commission has overlooked this fact is evident from the reference in its correspondence to this firm as "counsel for Americans For Reagan, NCCC." Such a reference is incorrect; Covington & Burling is counsel only to the Congressional Club. We no more represent Americans For Reagan than we do any other campaign slogan or product.

The Congressional Club is the only group of persons responsible for the creation and management of these projects. All communications involving Americans For Reagan and Conservatives For Reagan were developed by Congressional Club personnel and were paid for with Congressional Club funds. All letters were signed by the same individuals who usually sign Congressional Club communications and were sent to recipients on the Congressional Club's mailing lists. Likewise, all contributions from the recipients and viewers of these communications were sent to the Congressional Club's address, were processed by Congressional Club personnel and were deposited in the Congressional Club's accounts for use by the Congressional Club. On these facts, the phrases Americans For Reagan and Conservatives For Reagan do not constitute a committe or association.

Second, the Act and regulations require a group to "make expenditures" or "receive contributions" before it can be considered a political committee. As explained above, however, all monies expended or received in connection with the projects Americans For Reagan and Conservatives For Reagan were drawn on or deposited in bank accounts held solely by the Congressional Club.

All expenditures in connection with these projects were made on behalf of then-Governor Reagan's presidential campaign by the Congressional Club with its own funds. As non-entities, Americans For Reagan and Conservatives For Reagan had neither the funds to expend nor the capability of expending anything.

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Similarly, Americans For Reagan and Conservatives For Reagan, as nothing more than projects of the Congressional Club, did not have the ability to receive anything. Although these projects may have been designated as the payee on some of the checks sent by contributors to the Congressional Club, such checks were sent to the Congressional Club's address and were deposited in the Congressional Club's accounts. It was the Congressional Club which took in the monies associated with these projects and it was the Congressional Club which had complete dominion and control over such funds. Given the plain meaning of "receive" in these circumstances, -- "to take possession or delivery of" or "to come into possession of"*/ -- it is clear that the Congressional Club was the only entity that received contributions with regard to Americans For Reagan and Conservatives For Reagan, and that the Congressional Club is the only political committee before the Commission in this proceeeding.**/

Therefore, because Americans For Reagan and Conservatives For Reagan cannot properly be considered as political committees within the meaning of the Act and regulations, 2 U.S.C. § 432(e)(4) is by its very terms inapplicable to these projects. Thus,

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*/ Webster's Third New International Dictionary (1968).

**/ Indeed, these projects of the Congressional Club do not constitute new political committees any more than the fundraising projects commonly established by numerous non-profit organizations constitute new organizations.

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there is no basis upon which to find that the Congressional Club violated that provision by including the name of a candidate in the titles of its independent expenditure projects.

B. The Congressional Club Made Clear the Status of Its Independent Projects.

As demonstrated above, there is no reason to believe, and certainly not probable cause to believe, that the Congressional Club violated 2 U.S.C. § 432(e)(4). Moreover, not only do the facts fail to reveal any violation by the Congressional Club of the letter of the law; they fail as well to reveal any violation of the spirit of that statutory provision.

The purpose of 2 U.S.C. § 432(e)(4) is to provide the public a means by which to distinguish authorized from unauthorized committees. */ And, although the means chosen by Congress in that section were by their own terms inapplicable to the Congressional Club's independent projects, the Congressional Club assured that recipients and viewers of these communications were provided with information more than sufficient to distinguish the Congressional Club and its projects from the authorized committee of any candidate.

First, in the body of most letters sent out in connection with Americans For Reagan and Conservatives For Reagan the Congressional Club informed recipients that these projects

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*/ See Report of the Committee on House Administration, H.R. Rep. No. 96-422, 96th Cong. 1st Sess. at 13 (1979).

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were independent efforts in support of, but separate and distinct from, the Reagan campaign. The phrase "independent effort" was used repeatedly in many of these letters, and a substantial number of mailings emphasized the inability of then-Governor Reagan's authorized committee to accept additional contributions. Indeed, as pointed out in these instances, such federal restrictions were the very reason for the genesis of these independent expenditure projects.

Second, all mailings distributed in connection with the Congressional Club's independent projects contained a disclaimer designed to satisfy the requirements of 2 U.S.C. § 441d(a) and 11 C.F.R. § 110.11(a) */ by informing recipients that such communications were "authorized and paid for by the Congressional Club". Moreover, although this was not required by either the Act or the Commission's regulations, substantially all of these disclaimers also explained the status of the Congressional Club's independent projects by stating that Americans For Reagan or Conservatives For Reagan, as the case may be, was "an independent project of the Congressional Club" and was "not authorized by any presidential candidate." In addition, this entire

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*/ That these disclaimers did comply fully with the provisions of 2 U.S.C. § 441d(a) and 11 C.F.R. § 110.11(a) cannot be questioned. As the sample mailings submitted to the Commission in MUR 1252 demonstrate, all such disclaimers were "presented in a clear and conspicuous manner" more than sufficient to give "adequate notice of the identity of the persons who paid for or who authorized the communications." See, 11 C.F.R. § 110.11(a)(1); Advisory Opinion 1980-45 (March 19, 1981), where the Commission ruled that a disclaimer that was set in type face of equal or smaller size than those in this case satisfied the "clear and conspicuous" requirement of the foregoing regulation.

disclaimer appeared on the bottom front page of every such letter and often was repeated again in other materials included in such mailings. This effort to provide full and fair disclosure went well beyond what was required of the Congressional Club by 11 C.F.R. §110.11(a).*/

Third, the Congressional Club continued its policy of full disclosure with the advertisement at issue in this MUR. As noted above, this broadcast included a disclaimer designed to satisfy the provisions of 2 U.S.C. § 441d(a) and 11 C.F.R. § 110.11(a), even though the content of this advertisement did not bring it within the purview of those provisions. Indeed, without even seeing the disclaimer in question, the Commission found no reason to believe that the Congressional Club's sponsorship of this advertisement violated 2 U.S.C. § 441d(a)(3).

Thus, the Congressional Club made a significant good-faith effort in all of its communications in connection with Americans For Reagan and Conservatives For Reagan to inform recipients and viewers of the independent nature and sponsorship of these projects. Since these projects were not subject to the provisions of 2 U.S.C. § 432(e)(4) and the Congressional Club was not required under 2 U.S.C. § 441d(a) or 11 C.F.R. § 110.11(a)

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*/ 11 C.F.R. § 110.11(a)(1) states explicitly that disclaimers need not appear "on the front face or page of any such material."

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to go to the lengths that it did in this regard, there is no public policy to be served by a continuation of these enforcement matters.

II. The Congressional Club Relied in Good Faith upon Provisions of the Act and the Regulations of the Commission.

As demonstrated above, the Congressional Club relied upon the Act and the Commission's regulations and in all respects acted in good faith in accordance therewith. In entitling its projects Americans For Reagan and Conservatives For Reagan, the Congressional Club relied upon the fact that 2 U.S.C. § 432(e)(4) and 11 C.F.R. § 102.14(a) by their very terms apply only to "political committees". The Congressional Club further relied upon the definition of "political committee" set forth by Congress in 2 U.S.C. § 431(4)(A). And, in fashioning its disclaimers, the Congressional Club relied upon, and in fact exceeded, the requirements prescribed by the Commission in 11 C.F.R. § 110.11(a)(1).

2 U.S.C. § 438(e) provides in relevant part that

> any person who relies upon any rule or regulation prescribed by the Commission. . . and who acts in good faith in accordance with such rule or regulation shall not, as a result of such act, be subject to any sanction provided by this Act. . . .

This means just what it says. As stated by the Committee on House Administration, "[a] person who relies upon such regulations in good faith will not be subject to subsequent enforcement action." H.R. Rep. No. 96-422, supra at 24. Thus, further action by the Commission in this matter not only will fail

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to serve the public interest, but will contravene the explicit Congressional mandate of 2 U.S.C. § 438(e).

In addition, as noted above and in the Congressional Club's response to the complaint in MUR 1252, any attempt to apply the prohibition of § 432(e)(4) to the Congressional Club's independent expenditure projects in these circumstances would raise serious questions about the constitutionality of the Act, both as drafted by Congress and as applied by the Commission. Application of § 432(e)(4) to what are quite clearly nothing more than fundraising projects when that provision by its very terms is applicable only to political committees would render § 432(e)(4) and § 431(4(A) overly vague and unduly broad, and violative of both the First and Fifth Amendments. And, prohibiting the use of a candidate's name in such circumstances would constitute an impermissible restraint on the exercise by the Congressional Club of its First Amendment rights. Accordingly, these enforcement proceedings should be terminated.

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CONCLUSION

As demonstrated above, there is no basis in law or fact for believing that the Congressional Club violated either the letter or the spirit of 2 U.S.C. § 432(e)(4). Moreover, in all actions taken by the Congressional Club with respect to this matter, it relied in good faith upon the Commission's regulations. Accordingly, any further enforcement action by

the Commission is wholly unwarranted, and MUR 1316 and those portions of MURs 1252 and 1299 that allege a violation by the Congressional Club of 2 U.S.C. § 432(e)(4) should be dismissed.

Respectfully submitted,

Brice M. Clagett
Scott D. Gilbert

Covington & Burling
888 Sixteenth Street, N.W.
Washington, D.C. 20006

Attorneys for the
Congressional Club

Dated:

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BOX 19848 • 3825 BARRETT DRIVE • SUITE
RALEIGH, NORTH CAROLINA 27619 • (919) 781-6220

EXECUTIVE COMMITTEE
SENATOR JESSE HELMS
Honorary Chairman
THOMAS P. ELLIS
Chairman
CARTER WRENN
Treasurer
HUGH CHATHAM
ED MORRIS
MARION PARROTT
W. T. JOYNER, JR.

SENATOR HELMS TO ENDORSE RONALD REAGAN

TO: HELMS SUPPORTERS
FROM: CARTER WRENN
DATE: MARCH 7, 1980

The Congressional Club has produced and paid for a TV program with Senator Helms endorsing Governor Ronald Reagan. The Club has also purchased time so these programs will be shown on the nationwide cable television station WTBS, Channel 17 from Atlanta on Sunday evening, March 9, 1980 and again on Monday evening, March 10, 1980.

This is the beginning of the Congressional Club's independent expenditure campaign to promote Governor Ronald Reagan for President. (An independent expenditure campaign is an effort which is not coordinated with a candidate or his principle campaign committee.)

Below are the times you can see Senator Helms endorse Governor Reagan:

Sunday, March 9, 1980 - Channel 17
WTBS from Atlanta

Ruff House - Channel 17

* A 2 minute spot prior to the show at 10:30 p.m.
* A 1 minute spot after the show at 11:00 p.m.

The Big Battles - Channel 17
10:00 - 11:00 p.m. Monday

* A 2 minute spot during the first half of the show.
* A 1 minute spot after the show at 11:00

This independent campaign is one of several of the Club's projects this year, to help Senator Helms promote conservative candidates and causes.

Please watch these historical commercials on Sunday and Monday evenings. Also call as many of your friends as possible and urge them to watch the commercials too.

Thank you very much.

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SENATOR JESSE HELMS
HONORARY CHAIRMAN

CONSERVATIVES FOR REAGAN

POST OFFICE BOX 18848
RALEIGH, NORTH CAROLINA 27619

September 22, 1980

Dear Friend:

Did you know Federal law prevents Ronald Reagan from raising money?

The only money he can spend is the money the government is going to give him after the convention.

But did you also know friends and supporters of a Presidential candidate can spend as much money as they want to help get him elected?

And, that if you've sent any money to Ronald Reagan up to now, it doesn't count towards the $5,000 limit you have through an independent campaign?

In a Presidential race between Jimmy Carter and Ronald Reagan I can assure you Jimmy Carter's friends and supporters will be spending untold millions.

We must do the same for Ronald Reagan.

Who are these friends of Jimmy Carter who will be spending all this money to re-elect him?

It will be the liberal special interest groups. Think for a moment; won't it be groups such as --

-- labor unions
-- environmental organizations
-- pro-abortion organizations
-- liberal activist organizations
-- military disarmament groups
-- groups that want to sell sophisticated military knowledge and equipment to Russia and Communist China.
-- groups that oppose prayer in schools
-- groups that want to confiscate all privately-held guns
-- groups that oppose balancing the federal budget because they want to

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Conservatives for Reagan, 2525 Capital Drive, Suite 100, Raleigh, North Carolina 27603. An independent project of the Congressional Club and is not authorized by the President or Committee. The contents of this and all solicitations are authorized and paid for by the Congressional Club, Thomas F. Eagleton, Chairman, James Quinn, Treasurer.

spend more and more of your tax money for welfare and social experimental programs.

These are just a few examples. You probably can add to this list of groups that will be spending many millions, in fact probably tens of millions, of dollars to defeat Ronald Reagan.

Because of the 1974 Federal Election Law, Governor Reagan can not ask you himself to send money to help him defeat President Carter this November.

However, since many liberal supporters of President Carter will be raising and spending money independent of the Carter campaign, shouldn't you and I be raising and spending money independent of Governor Reagan's campaign to help elect him President?

Because this independent effort is being made without contacting Governor Reagan or any of his campaign aides, you can contribute up to $5,000 to the Congressional Club (instead of the $1,000 limit if you had sent the money directly to the Reagan campaign).

And remember, if you have sent any money to Governor Reagan, it doesn't count towards this $5,000 limit.

I helped form the Congressional Club back in 1973. Our purpose is to help elect conservatives to public office.

This year we expect to help at least 50 conservatives who are running for Congress.

However, when I realized the unfair advantage Jimmy Carter would have over Ronald Reagan because of his "friends" and position as President, I put together (through the Congressional Club) an independent effort to help Ron win the Republican nomination and defeat the Democratic nominee in November.

I think you will agree this is probably one of the 3 or 4 most important political contributions you have ever made. In fact, it may very well be the single most important contribution you will ever make.

Just think - for the first time in our lifetime, we may elect a conservative President of the United States.

But the election is less than 5 months from now.

Here is a list of some of the projects the Congressional Club and I would like to get started immediately:

1. I want to try to identify at least 1,000,000 people who will pledge to work for Ronald Reagan this

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coming September and October. The best way to do this is to use TV and the mails.

2. We will produce and run TV ads in August, September and October. The purpose of these ads will be to appeal to conservative blue and white collar workers and ethnic voters who traditionally vote Democratic or who consider themselves independent.

So today I am asking you to consider making the largest contribution you've ever made to a political candidate.

You and I have waited all of our life for this year.

We've worked so very hard and contributed a lot of money to help elect conservative candidates, and to help defeat liberal legislation, or to pass conservative legislation...We've attended rallies and so many speeches we can't remember them all.

We've signed many petitions and mailed lots of letters and post-cards for the conservative cause.

And it was all for this moment. All of our hopes and dreams are so close to being realized.

But it may not happen because Jimmy Carter and Ronald Reagan are limited by law to spend the same amount of money.

But Jimmy Carter's friends - such as the unions, the pro-abortion organizations, the environmental organizations and many other liberal groups - will probably raise and spend over 15 million dollars to defeat Ronald Reagan. That's over and above the "legal limit" funds.

If past elections are any indicator, you can be sure that the union bosses alone, using forced union dues, will spend over $10,000,000 to defeat Ronald Reagan. In 1968 the unions are reported to have spent over $50,000,000 to elect Hubert Humphrey and in 1976 it's estimated that the unions spent at least $22,000,000 to elect Jimmy Carter.

Governor Reagan is doing everything he humanly can. He's working 12 and 14 hours a day for 7 to 8 days straight without a day off.

Now the question is: What will you and I do to help this great conservative?

Since, in my opinion, this will probably be the most important political contribution you have ever made, please consider making the largest contribution you've ever made.

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Of course I know you contribute generously to candidates you believe in.

And, as we all know, this is THE BIG ELECTION. I feel very strongly that this is the most important election of our lifetime.

As best I can remember, only on rare occasions have I ever asked anyone to make a $2,000 contribution before.

But I'm asking you to write a check today for $2,000.

I have to say I'm a little surprised at myself that I can ask you for such a large check. But, of course, I'm not asking for myself. I'm asking for my friend, Ron.

Now I realize that $2,000 may just be more than you want to send.

And, if so, of course I'll understand. You know me well enough to know that I'll be very appreciative of whatever amount you feel you would like to send.

But we do need to start running these ads right away. So please mail your check today. Please don't put it off -- even one day.

Regards,

Jesse

JESSE HELMS

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ATTACHMENT 5a

Page 1 of 3 for Line Number 21
(Use separate schedule(s) for each category of the Detailed Summary Page)

SCHEDULE B — **ITEMIZED DISBURSEMENTS**

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (In Full)

BARBER-COLMAN COMPANY POLITICAL ACTION COMMITTEE

	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
A. Full Name, Mailing Address and ZIP Code Americans for Reagan 3825 Barret Dr. Raleigh, NC 27609	Campaign contribution Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	8/21/80	$1500.00
B. Full Name, Mailing Address and ZIP Code Citizens for Dave O'Neal 109 No. Dearborn Chicago, IL 60602	Campaign contribution U.S. Senate Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	8/21/80	1000.00
C. Full Name, Mailing Address and ZIP Code Dan Quayle Campaign Committee Box 216 Indianapolis, IN 46206	Campaign contribution U.S. Senate Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	8/21/80	500.00
D. Full Name, Mailing Address and ZIP Code Steve Symms for Senate Committee Box 471 Boise, ID 83701	Campaign contribution U.S. Senate Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	8/21/80	500.00
E. Full Name, Mailing Address and ZIP Code Paul Findley Campaign Committee Pittsfield, IL 62363	Campaign contribution U.S. Representative Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	8/21/80	500.00
F. Full Name, Mailing Address and ZIP Code O'Sullivan for Congress Committee Box 1980 Perth Amboy, NJ	Campaign contribution U.S. Representative Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	8/21/80	500.00
G. Full Name, Mailing Address and ZIP Code Citizens for Mary Lou Kent 22 Spring Lake Quincy, IL 62301	Campaign contribution State Senate Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	8/28/80	500.00
H. Full Name, Mailing Address and ZIP Code Citizens for Helen Harshbarger Route 4 Plainfield, IL 60544	Campaign contribution State Senate Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	8/28/80	500.00
I. Full Name, Mailing Address and ZIP Code Citizens for Robert "Tony" Bale 7421 Madison St. Forest Park, IL 60130	Campaign contribution State Representative Disbursement for: ☐ Primary ☒ General ☐ Other (specify):	8/28/80	500.00
SUBTOTAL of Disbursements This Page (optional)			
TOTAL This Period (last page this line number only)			

X

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32306d1T	*HARBER-COLEMAN CO PAC 1300 ROCK ST ATT AK ROBERT MCCARTHY ROCKFORD IL 61101	YEAR-TO-DATE: $1,500.00	(E) 08/28/83	$1,500.00	333.28395.004
45244826	*BRYANT SQUAD REP CLUB 3516-22 AVE S JUDI SANDERS MINNEAPOLIS MN 55407	YEAR-TO-DATE: $50.00	(E) 07/09/83	$50.00	333.07216.001
45317294	*CITI CORP VOLUNTARY 399 PARK AVENUE 32ND FLOOR ATTENTION GEORGE U VAN FRANK NEW YORK NY 10043	YEAR-TO-DATE: $15.00	(E) 06/01/83 (E) 08/01/83	$5.00 $10.00	032.01021.004 067.01371.001
3331942-	*CITI CORP EMPLOYEES 399 PARK AVE 32ND FLOOR ATTENTION GEORGE U VAN FRANK NEW YORK NY 10043	YEAR-TO-DATE: $395.00	(E) 09/25/83 (E) 09/05/83	$335.00 $60.00	034.25065.007 033.05014.1??
4577901?	*[illegible] GOVERNMENT FUND 23555 EUCLID AVE ATTENTION MK JH MCDONOUGH CLEVELAND OH 44117	YEAR-TO-DATE: $26.00	(E) 08/27/83	$26.00	033.27038.0??
4949822X	*[illegible] GOVERNMENT PROGRAM 2133 N CLARK ST ATTN ERNEST H AHEMANN CHICAGO IL 60614	YEAR-TO-DATE: $25.00	(E) 08/04/83	$25.00	032.04631.001
45738652	*THE DESERT REP WOMENS CLUB FED 15576 7TH ST ATTENTION MYRTLE U BROWN VICTORVILLE CA 92307	YEAR-TO-DATE: $25.30	(E) 09/05/83	$25.00	033.05017.0??
32611373	ALAUIANA GOP W ITTEE PO BOX 53127 LAFAYETTE LA 70505	YEAR-TO-DATE: $25.00	(E) 08/25/83	$25.00	033.27304.314
4345007?	*LIVINGSTON CO REPUBLICAN WOMAN ROUTE 1 CAROLYN E GOAD, TREAS CHILLICOTHE MO	YEAR-TO-DATE: $25.00	(E) 09/11/83	$25.00	034.11661.001

ATTACHMENT 5b

ATTACHMENT 6a

SCHEDULE B .ITEMIZED DISBURSEMENTS

Name of Committee (in Full)

ATLANTIC RICHFIELD CONCERNED CITIZENS FUND

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Pe
Republican National Committee 310 First Street, SE Washington, D.C. 20003	Contribution Party Committee	10-29-80	100*
	Disbursement for: ☐ Primary ☒ General ☐ Other (specify): YTD: 100.00		
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Pe
*Earmarked from: Richard A. Sufer 7251 SW Eleventh Street Miami, Florida 33144	Disbursement for: ☐ Primary ☐ General ☐ Other (specify): YTD: -		
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Pe
Conservatives for Reagan Post Office Box 12845 Raleigh, North Carolina	Ronald Reagan President	10-29-80	20.30*
	Disbursement for: ☐ Primary ☒ General ☐ Other (specify): YTD: 20.30		
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Pe
*Earmarked from: Roderick Bornick Cross Road-Curtis Farms Middlebury, Connecticut	Disbursement for: ☐ Primary ☐ General ☐ Other (specify): YTD:		
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This P
Anderson for President Committee 719 Eighth Street, SE Washington, D.C. 20003	John Anderson President	10-29-80	78*
	Disbursement for: ☐ Primary ☒ General ☐ Other (specify): YTD: 78.00		
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Eac Disbursement This P
*Earmarked from: John T. Williams 11 Stallhead Lane Berlin, New Jersey 08009	Disbursement for: ☐ Primary ☐ General ☐ Other (specify): YTD:		
SUBTOTAL of Disbursements This Page (optional)			198.30
TOTAL This Period (last page this line number only)			

ATTACHMENT 6b

Page 18 of 48 for LINE NUMBER 21

SCHEDULE B — ITEMIZED DISBURSEMENTS

Name of Committee (in Full)

ATLANTIC RICHFIELD CONCERNED CITIZENS FUND

	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
A. Full Name, Mailing Address and ZIP Code Republican National Committee 310 First Street, SE Washington, D.C. 20013	Contribution Party Committee Disbursement for: ☐ Primary ☒ General ☐ Other (specify): YTD: 140.00	10-22-80	140*
B. Full Name, Mailing Address and ZIP Code *Earmarked from: Norman L. Pollard 8907 Cedar Street Prairie Village, Kansas 6621[illegible]	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify): YTD:	Date (month, day, year)	Amount of Each Disbursement This Period
C. Full Name, Mailing Address and ZIP Code Conservatives for Reagan Post Office Box 12846 Raleigh, North Carolina	Purpose of Disbursement Contribution Disbursement for: ☐ Primary ☒ General ☐ Other (specify): YTD: 100.00	Date (month, day, year) 10-22-80	Amount of Each Disbursement This Period 100*
D. Full Name, Mailing Address and ZIP Code *Earmarked from: Norman L. Pollard 8907 Cedar Street Prairie Village, Kansas 6621[illegible]	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify): YTD:	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code National Republican Senatorial Comm. Post Office Box 2780 Washington, D.C. 20013	Purpose of Disbursement Contribution Party Committee Disbursement for: ☐ Primary ☒ General ☐ Other (specify): YTD: 12.00	Date (month, day, year) 10-22-80	Amount of Each Disbursement This Period 12*
F. Full Name, Mailing Address and ZIP Code *Earmarked from: Ruth Limbaus 222 S. Figueroa St., #1816 Los Angeles, CA 90012	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify): YTD:	Date (month, day, year)	Amount of Each Disbursement This Period
SUBTOTAL of Disbursements This Page (optional)			252
TOTAL This Period (last page this line number only)			

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ATTACHMENT 6c

Page 1 of 1 for LINE NUMBER 21 (Use separate schedule(s) for each category of the Detailed Summary Page)

SCHEDULE B **ITEMIZED DISBURSEMENTS**

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (In Full)

Cherokee Mills Committee for Good Government

	Purpose of Disbursement; Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
A. Full Name, Mailing Address and ZIP Code X Americans for Reagan		11/30	1000.00
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement; Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement; Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement; Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement; Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement; Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement; Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement; Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement; Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
SUBTOTAL of Disbursements This Page (optional)			1000.00
TOTAL This Period (last page this line number only)			1000.00

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SCHEDULE A ITEMIZED RECEIPTS ATTACHMENT 5B

Name of Committee (in Full)
The Congressional Club

	Name of Employer / Occupation	Date (month, day, year)	Amount of Each Receipt This Period
A. Full Name, Mailing Address and ZIP Code Atlantic Richfield Co. Concerned Citizen's Fund P.O. Box 19610 Los Angeles, CA 90019 Receipt For: ☐ Primary ☐ General ☐ Other (specify):		10-31-80 10-31-80	$ 20.30 $100.00
	Aggregate Year-to-Date—$120.30		
B. Full Name, Mailing Address and ZIP Code Boeing-Civic-Pledge-Program 14731 59th Avenue S. Tukwila, WA 98188 Receipt For: ☐ Primary ☐ General ☐ Other (specify):		11-12-80	$50.00
	Aggregate Year-to-Date—$ 50.00		
C. Full Name, Mailing Address and ZIP Code Cherokee Textile Mills Committee for Good Government Middle Creek Road Sevierville, TN 37862 Receipt For: ☐ Primary ☐ General ☐ Other (specify):		10-10-80	$1,000.00
	Aggregate Year-to-Date—$1,000.00		
D. Full Name, Mailing Address and ZIP Code Chevron Committee for Political Participation 225 Bush St. Room 1706 San Francisco, CA 94104 Receipt For: ☐ Primary ☐ General ☐ Other (specify):		10-27-80	$15.00
	Aggregate Year-to-Date—$15.00		
E. Full Name, Mailing Address and ZIP Code Concerned Citizen's Fund 653 Terrylynn Place Long Beach, CA 90807 Receipt For: ☐ Primary ☐ General ☐ Other (specify):		10-20-80	$200.00
	Aggregate Year-to-Date—$200.00		
F. Full Name, Mailing Address and ZIP Code Concerned Romanians for a Strong America Committee 1067 Fifth Avenue - 4th Floor New York, NY 10028 Receipt For: ☐ Primary ☐ General ☐ Other (specify):		11-06-80	$1,000.00
	Aggregate Year-to-Date—$1,000.00		
G. Full Name, Mailing Address and ZIP Code Emory & Henry College Republicans Box 169 Emory, VA 24327 Receipt For: ☐ Primary ☐ General ☐ Other (specify):		11-20-80	$15.00
	Aggregate Year-to-Date—$15.00		
SUBTOTAL of Receipts This Page (optional)			
TOTAL This Period (last page this line number only)			

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Brice M. Clagett, Esq.
Scott D. Gilbert, Esq.
Covington and Burling
888 Sixteenth Street, N.W.
Washington, D.C. 20006

RE: MURS 1252/1299 and 1316

Dear Mr. Clagett and Mr. Gilbert:

Based on complaints filed with the Commission on July 2, 1980, and October 17, 1980, the Commission determined on September 3, 1980, and March 25, 1981, that The North Carolina Congressional Club, now The Congressional Club, had violated 2 U.S.C. § 432(e)(4), a provision of the Federal Election Campaign Act of 1971, as amended. An investigation was instituted.

After considering all the evidence available to the Commission, the Office of General Counsel is prepared to recommend that the Commission find no probable cause to believe that violations have occurred. The Commission may or may not approve the General Counsel's Recommendation.

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of these cases. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies if possible) stating your position on the issues and replying to the brief of the General Counsel. Three copies of such brief should also be forwarded to the Office of General Counsel, if possible. The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of no probable cause to believe a violation has occurred.

Should you have any questions, please contact Anne Weissenborn at (202) 523-4175.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Brief

8304042051 C

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 29, 1981

Mr. Brice M. Clagett, Esquire
Counsel, North Carolina Congressional Club
Covington and Burling
888 Sixteenth Street, N.W.
Washington, D.C. 20006

Re: MUR 1252

Dear Mr. Clagett,

On January 21, 1981, this Office received a telephone call from Mr. John R. Bolton during which we were informed that he is planning a leave of absence from your firm and that you will be assuming responsibility for representing the North Carolina Congressional Club ("NCCC") in MUR 1252.

As you are undoubtedly aware, on October 20, 1980, this Office transmitted to Mr. Bolton a subpoena and order authorized by the Commission requiring NCCC to produce certain documents and to answer certain written questions. The Commission set November 12, 1980, as the return date. On October 27, 1980, Mr. Bolton requested an extention of time until November 21, 1980, to respond to the subpoena and order; this request was denied by the Commission on November 6, 1980. On November 25, 1980, Mr. Bolton wrote a letter to this Office in which he provided written responses to two document production requests contained in the subpoena and to all but one of the interrogatories. With regard to Specification 2 of the subpoena and to Interrogatory A-4, he asked for a statement regarding the need for the Commission to "examine the contents of political advertisements."

On December 19, 1980, during a telephone conversation with Ms. Patricia Bak, Mr. Bolton indicated that NCCC had objections to certain aspects of the subpoena and order. Ms. Bak suggested that these objections to put in writing; however, no such objections have been received. Ms. Bak also indicated the willingness of Commission counsel to meet with him to discuss all questions which he might have concerning this matter. No such meeting has been requested. On January 22, 1981, Ms. Anne Weissenborn, the attorney now assigned to this matter attempted to reach you by telephone to discuss this matter; her call has not yet been returned.

Accordingly, NCCC is directed to produce for inspection and copying the documents requested in Specification 2 of the

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Commission subpoena, namely "(a)ll documents and materials concerning any soliciation or request for funds for Americans for Reagan or by NCCC which related in any way to the furtherance of the election of Ronald Reagan as the presidential nominee of the Republican Party or the general election of Ronald Reagan as president in 1980 or which would aid in the defeat of any other 1980 presidential candidate." Such production is to be made at Room 706, 1325 K Street, N.W., Washington, D.C. at 10:00 a.m. on February 9, 1981, and on all subsequent business days thereafter required to complete inspection. An answer to Interrogatory A-4 must be submitted to the above address within ten (10) days of your receipt of this letter.

If you have any questions, please contact Ms. Weissenborn at (202) 523-5071.

Sincerely,

Charles N. Steele
General Counsel

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Mr. Brice M. Clagett, Esquire
Counsel, North Carolina Congressional Club
Covington and Burling
888 Sixteenth Street, N.W.
Washington, D.C. 20006

Re: MUR 1252

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CW 1/28/81

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If you have any questions, please contact Ms. Weissenborn at (202) 523-5071.

Sincerely,

Charles N. Steele
General Counsel

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MUR 1252/1299 ccc # 4024

COVINGTON & BURLING
888 SIXTEENTH STREET, N. W.
WASHINGTON, D. C. 20006

TELEPHONE
(202) 452-6000

WRITER'S DIRECT DIAL NUMBER
(202) 452-4766

TWX: 710-822-0005
TELEX: 89-593
CABLE: COVLING

RECEIVED
FEDERAL ELECTION COMMISSION
GENERAL COUNSEL
'81 FEB 20 P4:41

February 20, 1981

BY HAND

Anne Weissenborn, Esq.
Office of the General Counsel
Federal Election Commission
1325 K Street, N.W.
7th Floor
Washington, D.C. 20463

Dear Ms. Weissenborn:

Pursuant to our agreement, as confirmed by my letter of February 13, 1981, I am submitting herewith copies of the documents in the possession of the Congressional Club that were used to solicit funds with respect to the project Americans For Reagan. Any markings that would tend to identify the potential recipients of such documents have been deleted. In the event that the Congressional Club discovers additional responsive documents in its possession, it will supplement this submission accordingly.

With respect to Interrogatory A-4, the Congressional Club supplements its response of November 25, 1980, as follows: Some solicitations or requests for contributions to Americans For Reagan requested that checks be made payable to the Congressional Club; other solicitations or requests for contributions to Americans For Reagan requested that checks be made payable to Americans For Reagan; and other solicitations or requests for contributions to Americans For Reagan did not specify the payee.

If you have any futher questions, please let me know.

Sincerely,

Scott D. Gilbert

SDG/dg

Enclosure

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AMERICANS FOR REAGAN
UNITED STATES SENATOR JESSE HELMS, HONORARY CHAIRMAN

May 30, 1980

RECEIVED
FEB 20 P4:42
GENERAL COUNSEL

Dear

When I began writing this letter, one of my associates commented that this may very well be the most important letter I have ever written about Ronald Reagan.

It now appears certain that Ronald Reagan will be the Republican nominee for President. I rejoice in that prospect, and I know you do also. I am totally convinced that, if our nation is to be rescued from the very brink of disaster on which it now hangs, we must elect Ronald Reagan president.

But recent events lead me to believe that perhaps this last opportunity may slip through our fingers.

If the election were held today, the polls show that Governor Reagan could defeat Jimmy Carter. But the election is not until November 4th. In the meantime, some of the most powerful forces in the country will be working to destroy Ronald Reagan's candidacy.

What are those forces?

They are the liberal news media, union bosses, liberal and left-wing politicians, institution leaders and organizations devoted to forcing socialistic programs and doctrines upon the American people.

Remember the devastating campaign that was waged by these same forces against Barry Goldwater in 1964?

They employed the most scurrilous sort of slander, libel, innuendo and falsehood to defeat Senator Goldwater. I can never forget the ruthless, brutal and unscrupulous tactics employed by those powerful forces during the 1964 campaign.

And now the liberal establishment wants to do the same thing to Ronald Reagan!

If I could choose a beginning of this effort, I would pinpoint the recent evening news broadcast by one of the major networks which ended with an incredibly tasteless and vicious attack on Ronald

Reagan.

And even Governor Reagan's lovely wife, Nancy, has been the target of a scurrilous attack by one of the major daily newspapers.

These are just two of the opening shots in the all-out war against the candidacy of Ronald Reagan.

I will be frank with you: I am frightened. I fear very much that the awesome power of the liberal press and the broadcast king-makers will once again succeed in deceiving the American people.

But this time they must not succeed.

How are we going to fight back -- those of us who are convinced that Ronald Reagan represents perhaps the last hope of saving our nation from a long, dark night of economic and military collapse?

How do we end interest rates which have soared past 20% and inflation which exceeds 18%?

How do we end the world's ridicule of our nation and elect leaders who will not just stand by while the Communist war machine advances?

There are ways we can fight back. There are ways we can keep alive the truth about Ronald Reagan and the conservative cause.

That is why I have agreed to lead a national independent effort for Governor Reagan.

As Honorary Chairman of AMERICANS FOR REAGAN, I will give you an opportunity to even the odds for Governor Reagan.

Although Ronald Reagan will be limited in spending this fall by federal law, you and I can help him overcome the odds by waging an independent effort through AMERICANS FOR REAGAN.

As an independent campaign, AMERICANS FOR REAGAN can spend an unlimited amount of money on behalf of Ronald Reagan. AMERICANS FOR REAGAN'S first goal is to purchase over $500,000 worth of TV time this fall in the Presidential election.

Because the liberals control the news media, paid air time is the only way to reach the American people with the truth.

Will you help us do this?

Will you do two things today?

First, will you send AMERICANS FOR REAGAN, in the enclosed envelope, your maximum pledge and support of our fall campaign to

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buy TV time for Governor Ronald Reagan?

Second, will you match the pledge with an immediate contribution to this vital effort?

I hope you can send $25 now and promise $50 later.

Or perhaps, you can send $50 now and pledge $100 later.

Whether you can send $20, $50, $75, $500 or even $1,000 right now, please let me know your decision.

This time, because our cause is so important, I am asking you to dig down deep.

AMERICANS FOR REAGAN must have $26,800 in the next 30 days for the television campaign -- to purchase air time for TV ads.

Think of the future. Think of the consequences.

What kind of future will our children and grandchildren have if 20% interest rates and 18% inflation continue?

Or even more frightening, think of the consequences if our nation continues to be ridiculed and our leaders continue to stand by as the Communist war machine advances.

I believe that by working through this independent effort we can give Ronald Reagan a real chance at winning this fall.

His official campaign cannot take one contribution from you or from me once he has won the Republican Presidential nomination. He will have to rely on a completely independent effort. So please, send your contribution to AMERICANS FOR REAGAN. Do it today.

I am anxiously waiting to hear from you. God bless you.

Sincerely yours,

Jesse

JESSE HELMS

8304042057

AMERICANS FOR REAGAN

TO:

FROM:

Dear

Yes, I'll join you as a Reagan Volunteer. I understand that my contribution could make the difference in the Reagan-Carter contest. So I have enclosed my contribution to pay for your national crusade to elect Ronald Reagan as our next President. I enclose:

☐ $25	☐ $50	☐ $100
☐ $250	☐ $750	☐ $1,000
☐ $2,000	☐ $2,500	☐ $5,000

$_____ OTHER AMOUNT

☐ I have listed on the reverse side the names of friends, neighbors and relatives to whom you should send the Reagan bumper strip and ask to sign on as Reagan Volunteers.

☐ Yes, Senator Helms, send me the Reagan button, some Reagan brochures and a listing of any other Reagan materials you have available.

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Please accept this photo as a token of my appreciation for your continued support.

Please help us elect Ron if you can - His campaign is almost out of money.

Jesse

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NO POSTAGE
NECESSARY
IF MAILED
IN THE
UNITED STATES

BUSINESS REPLY MAIL

FIRST CLASS PERMIT NO. 1439 RALEIGH, N. C.

POSTAGE WILL BE PAID BY ADDRESSEE

AMERICANS FOR REAGAN

SENATOR JESSE HELMS
P. O. BOX 18848
RALEIGH, NORTH CAROLINA 27619

Senator Jesse Helms, Honorary Chairman

AMERICANS FOR REAGAN

August 23, 1980

81 FEB20 P4:42

Dear Friend:

Will you do me a personal favor and place the enclosed bumper sticker on your car today?

And, will you use the enclosed form to let me know if I can send you a Reagan for President button to wear?

I'd be deeply gratified if I could hear from you immediately.

I've been asked to serve as honorary national chairman of Americans for Reagan. We've got some pretty ambitious goals. For example, we hope to distribute more than three million bumper stickers and at least a million buttons during the next four weeks. We need your help, and I surely will appreciate your joining with us.

That's why we want millions of good Americans like yourself to put our bumper stickers on their cars -- to show solid support for a fine, decent man.

The left-wingers' strategy, as it has been described to me, is to launch a bitter campaign against Ron Reagan -- to portray him as an "extremist," and attack the platform on which he is running. The platform is a fine one. It spells out America's desire to build a superior defense capability, and to cut down on the loafers and parasites who now infest the federal welfare rolls, and set America's priorities straight again.

I am informed that no stone will be left unturned to discredit Ron Reagan by unfairly misrepresenting his service as Governor of California.

None of us should assume that Ron Reagan's enemies cannot do him great damage. They can -- and they will, if we do not stand together and show our united support for a fine, honorable American who has been standing on principle for as long as I have known him.

Remember what they did to Barry Goldwater in 1964?

The liberals hate and fear Ronald Reagan: they know that if he is elected he could end their domination and control of America.

Not prepared or mailed at government expense
Americans for Reagan, 1629 Barrett Drive, Suite 100, Raleigh, North Carolina 27609, is an independent political committee and is not authorized by any candidate or candidate's committee. The foregoing material and enclosures are authorized and paid for by the Congressional Club which is not authorized by any candidate or candidate's committee. The foregoing material and enclosures are authorized and paid for by the Congressional Club. Thomas F. Ellis, Chairman; Carter Anderson, Treasurer.

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During the past 3 1/2 years, the liberals and Jimmy Carter have promoted and built the most gigantic and wasteful welfare system in history.

President Reagan will cut the welfare roles just as he did in California as Governor -- by eliminating waste and fraud, and by limiting welfare to the truly needy.

The liberals have devalued our currency and pushed our economy to the brink of financial collapse -- with runaway inflation caused by deficit spending.

As President, Ronald Reagan has pledged to proceed immediately to reduce federal taxes and balance the federal budget.

The liberals in Congress -- and you know who they are -- have weakened and dismantled our military strength so that today ruthless dictators can seize American hostages with no fear of retaliation.

In less than four years, Jimmy Carter has managed to destroy the world-wide respect America had earned over two centuries. He has caused our nation to be regarded with distrust, and as a second rate power.

President Carter's response to Soviet advances has been to cancel the B-1 bomber, shelve the cruise missile, and stop the neutron bomb. He has terminated other essential strategic weaponry such as the new nuclear aircraft carrier. The United States has been left virtually defenseless in the face of growing Soviet military might.

In fact, while our defense capabilities have been weakened, the Soviets have been expanding their war machine. The Soviets have spent at least3 0% more than the U.S. on their military.

President Reagan will put an immediate end to the dismantling of our military capability. He will move to restore America as the world's superior military power -- not to make war, but to keep the peace and preserve freedom.

At home, the liberals' program of permissiveness, exemplified by their appointment of liberal judges, has created a society where criminals are coddled and frequently set scot free. Futhermore, the widespread use of illegal drugs, and the growing trend of immorality, threaten our children's future.

I fervently believe, as I told an audience the other day when I introduced Ronald Reagan, that God may be giving us just one more chance to save America.

The question is: can our nation survive four more years of Jimmy Carter and his ultra liberal advisors?

With inflation exceeding 15%, our economy is on the verge of collapse. And our nation faces a very real threat of World War III thanks to the appeasement of the Soviets.

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Yes, this may be our last chance. We face some inescapable choices:

Will our children live in freedom -- or will they suffer indescribable terror and hardship as slaves of a socialist state?

This is the turning point. Will it be freedom? Or will it be slavery?

I ask you to join in a national crusade to elect Ronald Reagan as the next President of the United States.

We have formed the organization, Americans for Reagan, because we believe it can be the most effective means available to you and me to help save the America we love and cherish.

Without Americans for Reagan, I fear Ronald Reagan may be overpowered, defeated -- even destroyed -- by the hostile left-wing onslaught on election day.

As honorary national chairman of Americans for Reagan, I think it is fair to say that we are already recognized as the most influential and effective independent committee working on behalf of Ronald Reagan

Thanks to laws passed by a liberal Congress, the official Reagan campaign cannot accept one penny from you or me. That's why this independent effort is so vitally important.

Union bosses and their liberal cohorts will be dishing out millions of dollars to help Carter defeat Ron Reagan. Your contribution to Americans for Reagan may well make the difference in the Reagan-Carter contest (one credible source estimates that labor union bosses contributed over 100 million dollars to Carter's effort in 1976).

The liberals fear our committee almost as much as they fear Ronald Reagan himself. Americans for Reagan stands alone as the one independent effort which has the know-how and dedication to elect Ronald Reagan President this year.

We have located the top political professionals in this country to work on behalf of Ronald Reagan.

I honestly believe that we have assembled the best TV consultants, the best organizational men, the best strategists, the best writers, and the most dedicated office staff.

Only one thing is missing. You.

Your help is needed to join our team and be one of the millions of Reagan Volunteers working for victory in 1980.

That's why I hope you will put that bumper strip on your car today. That's why I want you to wear a Reagan button between now and election day.

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AMERICANS FOR REAGAN

POST OFFICE BOX 18848
RALEIGH, NORTH CAROLINA 27619

Dear

☐ Yes, I'll join your emergency effort to rescue the Reagan for President campaign from a financial disaster that could topple America's last great hope. To help finance your independent advertising campaign for Ronald Reagan, I enclose my contribution for:

☐ $15	☐ $25	☐ $50
☐ $75	☐ $100	☐ $200
☐ $250	☐ $300	☐ $500
☐ $750	☐ $1,000	☐ Other

☐ No, I won't help you elect Ronald Reagan President of the United States. Yes, I understand that Ronald Reagan could lose the Presidency without my support; but I will not send you a contribution, Senator Helms.

0047086Y 2037

Make checks payable to AMERICANS FOR REAGAN

AMERICANS FOR REAGAN • JESSE HELMS, HON. CHAIRMAN

APPLY TO CLEAN SURFACE

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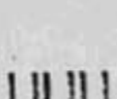

NO POSTAGE
NECESSARY
IF MAILED
IN THE
UNITED STATES

BUSINESS REPLY MAIL

FIRST CLASS PERMIT NO. [illegible]

[illegible]

AMERICANS FOR FREEDOM
SENATOR JESSE HELMS
P. O. BOX 19348
RALEIGH, NORTH CAROLINA 27619

AMERICANS FOR REAGAN
UNITED STATES SENATOR JESSE HELMS • HONORARY CHAIRMAN
3825 Barrett Drive, Suite 300, Dept 24, Raleigh, NC 27609

RECEIVED
FEB 20 4 11 PM '82
REAGAN-BUSH
GENERAL COUNSEL

8304042056S

Dear Friend:

Will you do me a personal favor and place the enclosed bumper sticker on your car today?

And, will you use the enclosed form to let me know if I can send you a Reagan for President button to wear?

I'll be deeply gratified if I could hear from you immediately.

I've been asked to serve as honorary national chairman of Americans for Reagan. We've got some pretty ambitious goals.

For example, we hope to distribute more than three million bumper stickers and at least a million buttons during the next four weeks. We need your help, and I sure will appreciate your joining with us.

Contrary to what some folks believe, the election of Ronald Reagan in November is far from certain. Every day I am hearing of plans by Ronald Reagan's enemies to conduct a hostile campaign against him.

That's why we want millions of good Americans like yourself to put our bumper stickers on their cars-- to show solid support for a fine, decent man.

The leftwingers' strategy, as it has been described to me, is to launch a bitter campaign against Ronald Reagan-- to portray him as an "extremist", and attack the platform on which he is running.

The platform is a fine one. It spells out America's desire to build a superior defense capability, and to cut down on the loafers and parasites who now infest the federal welfare rolls, and set America's priorities straight again.

I am informed that no stone will be left unturned to discredit Ronald Reagan by unfairly misrepresenting his service as Governor of California.

None of us should assume that Ronald Reagan's enemies cannot do him

Over, please....

introduced Ronald Reagan, that God may be giving us just one more chance to save America.

The question is: can our nation survive four more years of Jimmy Carter and his ultra liberal advisors?

With inflation exceeding 15%, our economy is on the verge of collapse. And our nation faces a very real threat of World War III thanks to the appeasement of the Soviets.

Yes, this may be our last chance. We face some inescapable choices:

Will our children live in freedom-- or will they suffer indescribable terror and hardship as slaves of a socialist state?

This is the turning point. Will it be freedom? Or will it be slavery?

I ask you to join in a national crusade to elect Ronald Reagan as the next President of the United States.

We have formed the organization, Americans for Reagan, because we believe it can be the most effective means available to you and me to help save the America we love and cherish.

Without Americans for Reagan, I fear Ronald Reagan may be overpowered, defeated-- even destroyed-- by the hostile left-wing onslaught on election day.

As honorary national chairman of Americans for Reagan, I think it is fair to say that we are already recognized as the most influential and effective independent committee working on behalf of Ronald Reagan.

Thanks to laws passed by a liberal Congress, the official Reagan campaign cannot accept one penny from you or me.

That's why this independent effort is so vitally important.

Union bosses and their liberal cohorts will be dishing out millions of dollars to help Carter defeat Ronald Reagan. We must match-- we must surpass --this high pressure attack on Ronald Reagan.

Your contribution to Americans for Reagan may well make the difference in the Reagan-Carter contest (one credible source estimates that labor union bosses contributed over 100 million dollars to Carter's effort in 1976).

The liberals fear our committee almost as much as they fear Ronald Reagan himself. Americans for Reagan stands alone as the one independent effort which has the know-how and dedication to elect Ronald Reagan as President this year.

We have located the top political professionals in this country to work on behalf of Ronald Reagan.

I honestly believe that we have assembled the best TV consultants, the

Over, please...

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REAGAN VOLUNTEER REPLY FORM

U.S. Senator Jesse Helms, Honorary Chairman, Americans for Reagan
3825 Barrett Drive, Suite 300, Dept. 24, Raleigh, North Carolina 27609

Dear Senator Helms:

☐ Yes, I'll join you as a Reagan Volunteer. I understand that my contribution could make the difference in the Reagan-Carter contest. So I have enclosed my contribution to pay for your national crusade to elect Ronald Reagan as our next President. I enclose:

☐ $25 ☐ $50 ☐ $100 ☐ $250 ☐ $500 ☐ $750 ☐ $1,000 ☐ $2,000

☐ $2,500 ☐ $5,000 ☐ $_____ OTHER AMOUNT

☐ I have listed on the reverse side the names of friends, neighbors and relatives who you should send the Reagan bumper strip to and ask to sign on as Reagan Volunteers.

☐ Yes, Senator Helms, send me the Reagan button, some Reagan brochures and a listing of any other Reagan materials you have available.

(PLEASE TYPE OR PRINT; MAKE CHECK PAYABLE TO AMERICANS FOR REAGAN)

NAME_____ PHONE_____ AREA CODE_____

STREET_____

CITY_____ STATE_____ ZIP_____

The Federal Election Commission requires that we ask the following...

OCCUPATION_____ PLACE OF BUSINESS_____

NOT PREPARED OR MAILED AT GOVERNMENT EXPENSE

Americans for Reagan, 3825 Barrett Drive, Suite 300, Dept. 24, Raleigh NC 27609, is an independent project of the Congressional Club, and is not authorized by any presidential candidate. The foregoing material and enclosures, are authorized and paid for by the Congressional Club, Thomas F. Ellis, Chairman, Carter Wrenn, Treasurer

8304042057 I

BUSINESS REPLY MAIL

First Class Permit No. 1439 Raleigh, N.C.

Postage Will Be Paid By:

Senator Jesse Helms

AMERICANS FOR REAGAN

3825 Barrett Drive. Suite 300. Dept. 24

Raleigh. North Carolina 27609

NO POSTAGE NECESSARY IF MAILED IN THE UNITED STATES

Reagan

AMERICANS FOR REAGAN

UNITED STATES SENATOR JESSE HELMS
Honorary National Chairman

September 18, 1980

RECEIVED
FEC
GENERAL COUNSEL
1980 FEB 20 P4:42

Dear Friend:

I want you to know that all of us deeply appreciate your recent contribution of $5 to Ronald Reagan.

I sincerely believe that the dollars you sent may help make the difference between success or defeat for Ronald Reagan. Especially since the official Reagan campaign can no longer accept any individual contributions.

As you know, the battle lines are now drawn, and I congratulate you for being a loyal member of the Reagan team.

If you watched the recent Democratic National Convention, I'm sure you were appalled, as I was, by the repeated and vicious attacks upon Ronald Reagan.

The bitter misrepresentations hurled at Gov. Reagan were shocking. It was apparent that the ultra-liberal Democrats, including Jimmy Carter and Ted Kennedy, will do and say anything to defeat Ronald Reagan.

And did you notice that they have even tried to shut down this committee - Americans for Reagan?

That's right, Americans for Reagan has been singled out by the Democrats and Jimmy Carter.

They know how effective you and other Americans can be through this independent effort - that's why they have tried to use the federal bureaucracy - the Federal Elections Commission - to shut down the Americans for Reagan Committee.

I wish you could see their arguments against your

Americans for Reagan, 3525 Barrett Drive, Suite 200, Post Office Box 27609, Raleigh, NC 27609

NOT PREPARED OR MAILED AT GOVERNMENT EXPENSE

Americans for Reagan is not affiliated with the Committee to Elect Ronald Reagan, authorized by the President Ronald Reagan Campaign Committee, and does not solicit contributions which are authorized by the Committee to Elect Ronald Reagan.

8304042057 3

exercising your First Amendment Right by being a participant in Americans for Reagan. What hypocrisy from a crowd that is receiving unlimited support from big labor bosses and the left leaning news media.

But this time you and I must make sure that they fail. Everything the American people love and cherish is at stake.

We must ask ourselves: Is God giving us one last chance to save America? Four more years of Jimmy Carter will take America down the road to ruin.

Four more years of Jimmy Carter will mean an America so weak that we may never again be safe from the Soviet threat.

The survival of our nation is on the line. Will your children and my children live in freedom or in slavery?

That's why I am again asking for another contribution to this crusade on behalf of Ronald Reagan and America.

This is a time for prayer -- and hard work - and sacrifice. We must work for Ronald Reagan as we have never worked for any previous candidate. And please, please send me your generous check today.

Because the hour is so short, because the cause is so important, won't you please consider sending a check for $10 today?

Please don't lay this letter aside. I urge you to take out your checkbook right now and send your maximum check to Americans for Reagan, and mail it today. Your help is so badly needed.

Sincerely,

Jesse Helms

Jesse Helms
United States Senator

8304042057

Jesse Helms

UNITED STATES SENATOR JESSE HELMS
Honorary National Chairman

AMERICANS FOR REAGAN

Dear

☐ Yes, I agree, everything the American people love and cherish is at stake in the contest between Ronald Reagan and Jimmy Carter. I will help you once again. My contribution to your crusade for Ronald Reagan is enclosed in the amount of...

$_____

☐ I have written the names of friends, relatives and/or neighbors on the back of this sheet and I urge you to appeal to them for help to elect Ronald Reagan.

(Please type or print below; make check payable to AMERICANS FOR REAGAN, Thank you)

☐MR. ☐MRS. ☐MISS_____

ADDRESS_____

CITY_____STATE_____ZIP_____

TELEPHONE_____AREA CODE_____

The Federal Election Commission requires that we ask the following...

OCCUPATION_____PLACE OF BUSINESS_____

Americans for Reagan 3825 Barrett Drive Suite 300 Dept 24 Raleigh NC 27609

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NO POSTAGE NECESSARY IF MAILED IN THE UNITED STATES

BUSINESS REPLY MAIL

First Class Permit No. 1439 Raleigh, N.C.

Postage Will Be Paid By:

Senator Jesse Helms

AMERICANS FOR REAGAN

3825 Barrett Drive, Suite 300, Dept. 24
Raleigh, North Carolina 27609

2659

AMERICANS FOR REAGAN
CARTER-REAGAN NATIONAL CAMPAIGN DIRECTOR
SENATOR JESSE HELMS HONORARY CHAIRMAN
[illegible] NORTH CAROLINA 27605

October 1, 1980

RECEIVED
OFFICE OF THE
GENERAL COUNSEL
FEB 20 P4:42

8304042057 7

Dear

Ronald Reagan has never needed your help more than now.

That's what Senator Jesse Helms told me on the phone when I told him about the critical financial crisis we're facing.

The situation is this: Unless Americans for Reagan can raise $263,000 in the next seven days then we must drastically alter the national Reagan media blitz now scheduled.

The situation is critical because we had to develop our media strategy without the money in the bank to cover it's cost.

That's why Senator Helms told me to contact you right away to ask if you would help save the Reagan campaign.

You see, these television ads are extremely important to the success of our national campaign. It's the only way we can get Governor Reagan's message to the people.

And it's the only way we can counter the distortions, slander, and half truths coming from the other side.

But this television time can only be purchased on a cash on delivery basis. That's why we must raise $263,000 within the next seven days or some of our ads will have to be cancelled.

You have been a good friend to Governor Reagan, and Senator Helms and I appreciate your generosity very much.

But without this last minute TV blitz, Governor Reagan won't be able to maintain the momentum necessary to defeat Jimmy Carter.

Governor Reagan is doing everything he can. He's working 12 to 14 hours a day for 7 to 8 days straight without a day off.

But Governor Reagan can't do it all alone--he must have our help, too.

And unless we help him now, when he needs it most, he could suffer a crushing defeat.

Believe me, I wouldn't be asking for your help again if this wasn't of the utmost importance.

So please, I urge you to make a special media contribution today, of $25, $50, $100 or even $200...Every penny is critically important.

I feel confident we won't have to cancel any of our TV spots if you'll mail me your check without delay.

Senator Helms and I are hoping to hear from you soon.

God bless you for your sacrifices.

Sincerely,

Carter

Carter Wrenn
National Campaign Director

P.S. I served as the Campaign Director for Jesse Helms during his campaign in 1978. A last minute media blitz made the difference for him then, and I know it will for Governor Reagan in 1980.

8304042057 8

NATIONAL MEDIA CAMPAIGN
URGENT REPLY FORM

To: Carter Wrenn
National Campaign Director
Americans For Reagan
PO Box 18848
Raleigh, NC 27619

FROM:

Dear Carter:

Please tell Senator Helms not to cancel any television ads scheduled for Ronald Reagan.

I have enclosed my special media contribution so that you can launch the last minute national media campaign to elect Ronald Reagan President.

( ) $25 ( ) $100 ( ) $500 ( ) $5000

( ) $50 ( ) $250 ( ) $1000 ( ) Other

2495 45157531

"I deeply believe the outcome of this election will determine America's position in the world and whether or not we survive as a free and independent nation."

Ronald Reagan

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NATIONAL MEDIA CAMPAIGN
URGENT REPLY

Senator Jesse Helms, Honorary Chairman

AMERICANS FOR REAGAN

September 15, 1980

RECEIVED
1 FEB 20 P4:42
OFFICE OF THE
GENERAL COUNSEL

Dear

I want you to know that all of us deeply appreciate your recent contribution to Americans for Reagan.

I sincerely believe that the dollars you sent may help make the difference between success or defeat for Ronald Reagan. Especially since the official Reagan campaign can no longer accept any individual contributions.

As you know, the battle lines are now drawn, and I congratulate you for being a loyal member of the Reagan team.

If you watched the recent Democratic National Convention, I'm sure you were appalled, as I was, by the repeated and vicious attacks upon Ron Reagan.

The bitter misrepresentations hurled at Gov. Reagan were shocking. Oh, I realize that politicians will be politicians, but it was so apparent that the ultra-liberal Democrats, including Jimmy Carter and Ted Kennedy, will do and say anything to defeat Ronald Reagan.

And did you notice that they have even tried to shut down this committee - Americans for Reagan?

That's right. Americans for Reagan has been singled out by the Democrats and Jimmy Carter.

They know how effective you and other Americans can be through this independent effort - that's why they have tried to use the federal bureaucracy - the Federal Elections Commission - to shut down the Americans for Reagan Committee.

I wish you could see their arguments against your exercising your First Amendment Right by being a participant in Americans for Reagan. What hypocrisy from a group that is receiving unlimited support from big labor

Not prepared or mailed at government expense

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bosses and the left leaning news media.

But this time you and I must make sure that they fail. Everything the American people love and cherish is at stake.

We must ask ourselves: Is God giving us one last chance to save America? Four more years of Jimmy Carter will take America down the road to ruin.

Four more years of Jimmy Carter will mean an America so weak that we may never again be safe from the Soviet threat.

The survival of our nation is on the line. Will your children and my children live in freedom or in slavery?

That's why I am again asking for another contribution to this crusade on behalf of Ronald Reagan and America.

This is a time for prayer -- and hard work -- and sacrifice. We must work for Ronald Reagan as we have never worked for any previous candidate. And please, please send me your generous check today.

Because the hour is so short, because the cause is so important, won't you please consider sending a check for $25, $50, $75 or $100 or more today?

Please don't lay this letter aside. I urge you to take out your checkbook right now, and send your maximum check to Americans for Reagan, and mail it today. Your help is so badly needed.

Sincerely,

Jesse Helms

JESSE HELMS
UNITED STATES SENATOR

8304042053

AMERICANS FOR REAGAN

TO:

U. S. Senator Jesse Helms
Honorary National Chairman
PO Box 18848
Raleigh, NC 27619

FROM:

Dear Senator Helms,

( ) I realize that my continued support of your effort to elect Ronald Reagan President will be crucial to the outcome of the election in November. You can count on me to do everything I can to see that Ronald Reagan is elected President.

( ) I have enclosed the largest check I possibly can to help Reagan defeat Jimmy Carter and his liberal friends. (Check Box)

( ) $25 ( ) $50 ( ) $100 ( ) $250

( ) $500 ( ) $750 ( ) $1,000 ( ) $2,000

( ) $5,000 Other _____

Signature _____

2485 0001204#

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8304042058

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BUSINESS REPLY MAIL

FIRST CLASS PERMIT NO. 1439 RALEIGH, N. C.

POSTAGE WILL BE PAID BY ADDRESSEE

AMERICANS FOR REAGAN

SENATOR JESSE HELMS
P. O. BOX 18848
RALEIGH, NORTH CAROLINA 27619

SENATOR JESSE HELMS

NATIONAL CONVENTION HEADQUARTERS AMERICANS FOR REAGAN

RECEIVED
OFFICE OF THE
GENERAL COUNSEL
1 FEB 20 P4:42

8304042058

I'm writing to you from the Republican National Convention in Detroit to ask you to do a special favor for me and Ronald Reagan.

This Thursday night, Ronald Reagan will deliver his speech accepting the Republican Presidential nomination to run against Jimmy Carter.

As many voters as possible must watch this event on national television.

That's why I'm asking you to call your friends and your neighbors to watch Ronald Reagan deliver his historic speech.

And as I watch Ronald Reagan speak, I will be thinking of you because you helped make his nomination possible. In fact, I share Ronald Reagan's appreciation for the support he has received from you and countless Americans like you across the nation.

From the bottom of my heart, I say thank you, and God bless you.

But your work is not over. In fact, it has just begun.

You and I face perhaps the greatest challenge of our lifetime.

The liberal Democrats and Jimmy Carter have brought this nation to the brink of disaster. Not since the Great Depression -- and perhaps not even then -- has America been so close to financial collapse.

Jimmy Carter and his allies in Congress have neglected our national defense to the point that we are becoming powerless to protect our national interests against foreign enemies. The Soviet Union knows this, and is becoming more aggressive and more reckless as its military capabilities grow and ours decline.

Can this nation we love, the United States of America, survive another four years under Jimmy Carter?

Americans for Reagan

On Tuesday, November 4, you and I and our fellow voters will decide whether we begin anew with renewed hope in the American Dream under the inspired leadership of a great American, Ronald Reagan. Or, will this nation slide into an abyss from which it will never return?

The choice you and I face is crystal clear. If not for ourselves, then for our children and for their children we must totally dedicate ourselves to the election of Ronald Reagan as President of the United States.

We must work tirelessly.

And, our prayers must be fervent on behalf of our nation.

I firmly believe that Ronald Reagan was meant for this moment in history.

By reordering our nation's priorities and balancing the federal budget, Ronald Reagan can put an end to runaway inflation, high interest rates and the debasement of our currency.

Ronald Reagan's total commitment to the security of the United States will increase our chances for peace, and insure that the United States is once again the respected leader of the free world.

But it's not going to happen unless you and I act.

The liberals aren't going to give up easily.

The news media monopoly has already begun its attack on Governor Reagan. His record and his views have been and will be distorted and twisted. Millions of dollars are being poured into a Stop Reagan campaign by the liberal establishment which has dominated this nation for so many years.

No stone will be left unturned in this massive effort to defeat and destroy Ronald Reagan and all we stand for.

Yet, Ronald Reagan will not be allowed to call on you for help to counter the lies and propaganda that could end his chances for the Presidency. The official Reagan campaign is prohibited from soliciting or accepting your contribution or mine, thanks to laws passed by the liberal Congress.

But fortunately, there is a way you can help elect Ronald Reagan -- let me explain.

Because the Reagan campaign cannot accept your contribution, we have decided to launch an independent effort to counter the liberal forces arrayed against Governor Reagan.

If you and I reach the American people with the truth about

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Ronald Reagan, he can win on November 4. If we fail, the liberals will succeed in distorting the Reagan record and Ronald Reagan will lose.

Either you and I commit ourselves to a victory for Ronald Reagan, or we will suffer a defeat from which this great nation may never recover. That's why I'm calling upon you to pledge yourself to a victory for Ronald Reagan.

This election may be decided by only a few votes in key states and that's where we must put our time, effort and resources. Television spots, newspaper ads and radio commercials have already been prepared. And brochures and other campaign materials will soon be ordered.

I honestly believe that this independent campaign can mean the difference between victory or defeat for Ronald Reagan, and that is why I am asking for your help today.

First, will you call as many friends and neighbors as possible and ask them to watch Ronald Reagan as he delivers his acceptance speech in Detroit this Thursday night?

Second, will you give the enclosed blue envelopes to some of your special friends and ask them to mail a generous check to us at AMERICANS FOR REAGAN today?

And third, won't you please dig down deep and send me at least $25 or even $50 or $100 today?

In fact, won't you please sit down right this minute and write out your check and send it back to me in the enclosed white envelope?

Time is very short.

We must begin buying television time immediately if we are to get on the air in those crucial swing states.

You and I are fighting for survival.

So please be as generous as you possibly can.

And mail your check today.

Remember, Ronald Reagan and our nation need your financial help, your efforts, and your prayers. God bless you.

Sincerely,

Jesse

JESSE HELMS

8304042058 7

AMERICANS FOR REAGAN
NATIONAL CONVENTION HEADQUARTERS

REPLY FORM

Dear

☐ I listened to Ronald Reagan's speech on national TV and I'm with you in your independent campaign to elect this great American as President in 1980. I agree, this is the greatest challenge of our lifetime, and to help meet it I have enclosed my contribution for:

$_____

☐ I asked ( ) friends and neighbors to watch Ronald Reagan on TV.

☐ ( ) of the friends and neighbors I asked to watch Ronald Reagan on TV have pledged to send a contribution to AMERICANS FOR REAGAN.

☐ I am sorry, Senator Helms, but I can not help you elect Ronald Reagan President at this time.

Sincerely,

MAKE CHECKS PAYABLE TO AMERICANS FOR REAGAN

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Please give this to a friend — J. H.

NO POSTAGE NECESSARY IF MAILED IN THE UNITED STATES

BUSINESS REPLY MAIL

FIRST CLASS PERMIT NO. 1439 RALEIGH, N. C

POSTAGE WILL BE PAID BY ADDRESSEE

AMERICANS FOR REAGAN

SENATOR JESSE HELMS
P. O. BOX 18848
RALEIGH, NORTH CAROLINA 27619

8304042059O

NO POSTAGE NECESSARY IF MAILED IN THE UNITED STATES

BUSINESS REPLY MAIL

FIRST CLASS PERMIT NO. 1439 RALEIGH, N. C.

POSTAGE WILL BE PAID BY ADDRESSEE

AMERICANS FOR REAGAN

SENATOR JESSE HELMS
P. O. BOX 18848
RALEIGH, NORTH CAROLINA 27619

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Please give this to a friend — J. H.

NO POSTAGE NECESSARY IF MAILED IN THE UNITED STATES

BUSINESS REPLY MAIL

FIRST CLASS PERMIT NO. 1439 RALEIGH, N. C

POSTAGE WILL BE PAID BY ADDRESSEE

AMERICANS FOR REAGAN

SENATOR JESSE HELMS
P. O. BOX 18848
RALEIGH, NORTH CAROLINA 27619

8304042059 2

U.S. Senator Jesse Helms
Honorary National Chairman

Carter Wrenn
Executive Director

RECEIVED
FEB 20 P4:42
GENERAL COUNSEL

Dear

☐ Congratulations on this victory, and tell Senator Helms that I am proud to have helped him elect Ronald Reagan as President in 1980.

Now I understand you have a debt to clear up for Americans for Reagan in the amount of $247,328.63, and that $32,752.27 of this must be paid by Friday, November 21.

I am proud to help you once again. I have enclosed my check payable to AMERICANS FOR REAGAN in the amount:

$_____

☐ Congratulations on this victory. I understand why you felt it necessary to purchase more television commercials to assure a Reagan victory, but I am unable to contribute to help you clear up your campaign debt.

(PLEASE PRINT BELOW CLEARLY)

☐MR. ☐MRS. ☐MISS _____

ADDRESS _____

CITY _____ STATE _____ ZIP _____

Federal Election Law requires that we ask:

OCCUPATION _____

PLACE OF BUSINESS _____

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BUSINESS REPLY MAIL

First Class Permit No. 1439 Raleigh, N.C.

Postage Will Be Paid By:

Carter Wrenn

AMERICANS FOR REAGAN

3825 Barrett Drive, Suite 300, Dept. 24
Raleigh, North Carolina 27609

Jesse Helms
United States Senator

Unofficial Business

The Capitol Building
Capitol Hill
Washington, D.C. 20510

RECEIVED
OFFICE OF THE
GENERAL COUNSEL
83 FEB 20 P4:32

8304042059 4

Dear Friend of Ron Reagan:

Can Ronald Reagan still lose the Republican Presidential nomination?

Frankly, until yesterday, my answer would have been: No!

But yesterday, some of us sat down, and began to analyze the cold hard facts. Let me share them with you.

After just one primary, the Reagan campaign had already spent two-thirds of the total amount of money it will be allowed to spend by the federal election laws.

Thus with many important primaries to go, the Reagan campaign is running out of funds.

That's right. There will be no money left for major primaries in Texas, California, etc.

No money for TV ads, newspaper ads.

No money to pay for travel, for rallies, etc.

And if Reagan falters in late primaries, he could lose the nomination!

Remember: Ronald Reagan may not spend more than the limit imposed by the Federal Election Commission.

Ronald Reagan, perhaps our last best chance to save America from catastrophe, may yet be defeated by a liberal Republican, due to lack of funds.

Meanwhile, John Anderson is raising more than $150,000 a day!

John Anderson is the ultra-liberal Republican who supports gun control, abortion, a 50¢ per gallon tax on gasoline, and other Ted Kennedy/George McGovern schemes and programs.

And George Bush still has $3,000,000 in his campaign treasury.

NOT PREPARED OR MAILED AT GOVERNMENT EXPENSE

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Communist aggression in Afghanistan, and the Soviet military regime now threatens to cut off the oil supply of the entire free world.

Soviet tanks roll - and our only response is retreat and appeasement.

The liberals have virtually dismantled America's military capability, and the very security of our nation is in jeopardy.

Jimmy Carter cancelled the B-1 Bomber, scrapped the neutron bomb, shelved the cruise missile, terminated our new nuclear aircraft carrier. The Soviets have built an even mightier military machine.

The Soviets now spend 50% more than the United States on their military budget.

Will we preside over the demise of America, and the end of freedom in our lifetime? Or will there be a rebirth of honor and strength and a rededication to American ideals with a Ronald Reagan administration leading America?

It's up to us. You and I can help make the decision.

Time is short.

Each day, the official Reagan campaign faces new limitations on its efforts. The advertising budget has already been slashed.

That's why this emergency independent effort for Ronald Reagan is so crucial.

As an independent campaign, federal law allows us to spend an unlimited amount of money on behalf of Ronald Reagan.

And that's just what must be done if Ronald Reagan is to win the Republican Presidential nomination.

We must match the media blitze of John Anderson.

We must reach Republican voters through TV, radio, newspapers, and targeted direct mail.

I have prepared television commercials for this effort, and they can be aired only if you respond to this letter.

As each day passes, the threat to the Reagan nomination becomes greater.

That's why I'm asking you to send your dollars today to the Americans for Reagan campaign.

Your dollars will be used in key primary states to help save the Reagan campaign.

If you'll sit down right now and write out your maximum check to

Over ---

8304042059

U.S. Senator Jesse Helms, Honorary Chairman, AMERICANS FOR REAGAN
3825 Barret Drive, Suite 300, Dept. 24, Raleigh, North Carolina 27609

Dear Senator Helms:

☐ Yes, I'll join your emergency effort to rescue the Reagan for President Campaign from a financial disaster that could topple America's last great hope. To help finance your independent advertising campaign for Ronald Reagan, I enclose my contribution for:

☐ $1,000 ☐ $750 ☐ $500 ☐ $300 ☐ $250 ☐ $200 ☐ $100
☐ $75 ☐ $50 ☐ $25 ☐ $15 ☐ $_____OTHER AMOUNT

☐ No, I won't help you elect Ronald Reagan President of the United States. I understand that Ronald Reagan could lose the Presidency without my support, but I will not send you a contribution, Senator Helms.

Please make check or money order payable to AMERICANS FOR REAGAN, and type or handwrite your name and address clearly below. Thank you.

NAME_____PHONE_____AREA CODE_____

ADDRESS_____

CITY_____STATE_____ZIP_____

The Federal Election Commission requires that we ask the following.....

OCCUPATION_____

PLACE OF EMPLOYMENT_____

NOT PREPARED OR MAILED AT GOVERNMENT EXPENSE

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NO POSTAGE
NECESSARY
IF MAILED
IN THE
UNITED STATES

BUSINESS REPLY MAIL
First Class Permit No. 1439 Raleigh, N.C.

Postage Will Be Paid By:

Senator Jesse Helms
Americans for Reagan
3825 Barret Drive, Suite 300, Dept. 24
Raleigh, North Carolina 27609

PR

AMERICANS FOR REAGAN

UNITED STATES SENATOR JESSE HELMS, HONORARY CHAIRMAN

July 25, 1980

RECEIVED
81 FEB 20 P4:42
GENERAL COUNSEL

83040420596

Dear

On Tuesday, November 4, you and I and our fellow voters will decide whether we begin anew with renewed hope in the American Dream under the inspired leadership of a great American, Ronald Reagan. Or, will this nation slide into an abyss from which it will never return?

The choice you and I face is crystal clear. If not for ourselves, then for our children and for their children, we must totally dedicate ourselves to the election of Ronald Reagan as President of the United States.

I firmly believe that Ronald Reagan was meant for this moment in history.

By reordering our nation's priorities and balancing the federal budget, Ronald Reagan can put an end to runaway inflation, high interest rates and the debasement of our currency.

Ronald Reagan's total commitment to the security of the United States will increase our chances for peace and insure that the United States is once again the respected leader of the free world.

But it's not going to happen unless we act because the liberals aren't going to give up easily.

The news media monopoly has already begun its attack on Governor Reagan. His record and his views have been and will be distorted and twisted. Millions of dollars are being poured into a Stop Reagan campaign by the liberal establishment which has dominated this nation for so many years.

Yet, Ronald Reagan will not be allowed to call on your PAC for help to counter the lies and propaganda that could end his chances for the Presidency. The official Reagan campaign is prohibited from soliciting or accepting your contribution or mine, thanks to laws passed by the liberal Congress.

That is why I have agreed to lead a national independent effort for Governor Reagan.

AMERICANS FOR REAGAN will give your PAC the opportunity to even the odds for Governor Reagan.

This election may be decided by only a few votes in key states and that's where we must put our time, effort and resources. Television spots, newspaper ads and radio commercials have already been prepared. And brochures and other campaign materials will soon be ordered.

I honestly believe that AMERICANS FOR REAGAN can mean the difference between victory or defeat for Ronald Reagan, and that is why I am asking for your PAC's help today.

Will you do me and Ronald Reagan a favor and recommend that your Political Action Committee support AMERICANS FOR REAGAN with a maximum contribution?

I believe that by working through this independent effort we can give Ronald Reagan a real chance at winning this fall.

I am anxiously waiting to hear from you.

Sincerely,

Tom Ellis

Tom Ellis

TE:kwd

8304042059

Jesse Helms
United States Senator

Unofficial
Business

The Capitol Building
Capitol Hill
Washington, D.C. 20510

June 16, 1980

RECEIVED
GENERAL COUNSEL
81 FEB20 P4:42

8304206000

Dear Friend:

When I began writing this letter, one of my associates commented that this may very well be the most important letter I have ever written about Ronald Reagan.

It now appears certain that Ronald Reagan will be the Republican nominee for President. I rejoice in that prospect and I know you do also. I am also totally convinced that if our nation is to be rescued from the very brink of disaster on which it now hangs, then we must elect Ronald Reagan President.

But recent events lead me to believe that perhaps this last opportunity may slip through our fingers.

If the election were held today, the polls show that Governor Reagan could defeat Jimmy Carter. But the election is not until November 4th. In the meantime, some of the most powerful forces in the country will be working to destroy Ronald Reagan's candidacy.

What are those forces?

They are the liberal news media, union bosses, liberal and left-wing politicians, institution leaders and organizations devoted to forcing socialistic programs and doctrines upon the American people.

Remember the devastating campaign that was waged by these same forces against Barry Goldwater in 1964?

They employed the most scurrilous sort of slander, libel, innuendo and falsehood to defeat Senator Goldwater. I can never forget the ruthless, brutal and unscrupulous tactics employed by those powerful forces during the 1964 campaign.

And now the liberal establishment wants to do the same thing to Ronald Reagan.

If I could choose a beginning of this effort, I would pinpoint the recent evening news broadcast by one of the major networks which ended with an incredibly

NOT PREPARED OR MAILED AT GOVERNMENT EXPENSE

Americans for Reagan, 3825 Barrett Drive, Suite 300, Dept. 24, Raleigh, NC 27609, is an independent project of the Congressional Club, and is not authorized by any presidential candidate. The foregoing material and enclosures, are authorized and paid for by the Congressional Club, Thomas F. Ellis, Chairman; Carter Wrenn, Treasurer.

tasteless and vicious attack on Ronald Reagan.

And even Governor Reagan's lovely wife, Nancy, has been the target of a scurrilous attack by one of the major daily newspapers.

These are just two of the opening shots in the all-out war against the candidacy of Ronald Reagan.

I will be frank with you. I am frightened. I fear very much that the awesome power of the liberal press and the broadcast kingmakers will once again succeed in deceiving the American people. But this time they must not succeed.

How are we going to fight back--those of us who are convinced that Ronald Reagan represents perhaps the last hope of saving our nation from a long, dark night of economic and military collapse?

How do we end interest rates which have soared past 20% and inflation which exceeds 18%?

How do we end the world's ridicule of our nation and elect leaders who will not just stand by while the Communist war machine advances?

There are ways we can fight back. There are ways we can keep alive the truth about Ronald Reagan and the conservative cause.

That is why I have agreed to lead a national independent effort for Governor Reagan.

As Honorary Chairman of Americans for Reagan, I will give you an opportunity to even the odds for Governor Reagan.

Although Ronald Reagan will be limited in spending this fall by federal law, you and I can help him overcome the odds by waging an independent effort through Americans for Reagan.

As an independent campaign, Americans for Reagan can spend an unlimited amount of money on behalf of Ronald Reagan. Americans for Reagan's first goal is to purchase over $500,000 of T.V. time this fall in the Presidential election.

Because the liberals control the news media, paid air time is the only way to reach the American people with the truth.

Will you help us do this?

Will you do two things today?

First, will you send Americans for Reagan, in the enclosed envelope, your maximum pledge and support of our fall campaign to buy T.V. time for Governor Ronald Reagan?

Second, will you match the pledge with an immediate contribution to this

8304042060 1

vital effort?

Friend, I hope you can send $500 now and promise $1000 later.

Or perhaps you can send $1000 now and pledge $2000 later.

Whether you can send $1000 or $500 right now, please let me know your decision.

This time, because our cause is so important, I am asking you to dig down deep.

Americans for Reagan must have $26,800 in the next 30 days for the television campaign--to purchase air time for T.V. ads.

Think of the future. Think of the consequences.

What kind of future will our children and grandchildren have if 20% interest rates and 18% inflation continue?

Or even more frightening, think of the consequences if our nation continues to be ridiculed and our leaders continue to stand by as the Communist war machine advances.

I believe that by working through this independent effort we can give Ronald Reagan a real chance at winning this fall.

His official campaign cannot take one contribution from you or from me once he has won the Republican Presidential nomination. He will have to rely on a completely independent effort. So please, send your contribution to Americans for Reagan. Do it today.

I am anxiously waiting to hear from you. God bless you.

Sincerely yours,

Jesse Helms

Jesse Helms
United States Senator

8304042060 2

U.S. Senator Jesse Helms, Honorary Chairman, AMERICANS FOR REAGAN
3825 Barrett Drive, Suite 300, Dept. 24, Raleigh, North Carolina 27609

Dear Senator Helms:

☐ YES, I'll join your emergency effort to rescue the Reagan for President Campaign from a financial dfsaster that could topple America's last great hope. To help finance your independent advertising campaign for Ronald Reagan, I enclose my contribution for:

☐ $1,000 ☐ $750 ☐ $500 ☐ $300 ☐ $250 ☐ $200 ☐ $100 ☐ $75
☐ $50 ☐ $25 ☐ $15 ☐ $_____ OTHER AMOUNT

☐ I pledge to send you $_____ to help Governor Reagan in the fall, in addition to the contribution I have enclosed.

☐ NO, I won't help you elect Ronald Reagan President of the United States. I understand that Ronald Reagan could lose the Presidency without my support but I can not help you.

(Please make check payable to AMERICANS FOR REAGAN, and type or handwrite below clearly.)

NAME_____ PHONE_____ AREA CODE_____

ADDRESS_____

CITY_____ STATE_____ ZIP_____

The Federal Election Commission requires that we ask the following...

OCCUPATION_____

PLACE OF EMPLOYMENT_____

NOT PREPARED OR MAILED AT GOVERNMENT EXPENSE

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8304205

8304042060

NO POSTAGE
NECESSARY
IF MAILED
IN THE
UNITED STATES

BUSINESS REPLY MAIL
First Class Permit No 1439 Raleigh N C

Postage Will Be Paid By

Senator Jesse Helms
Americans for Reagan
3825 Barrett Drive, Suite 300, Dept. 24
Raleigh, North Carolina 27609

P2997

Jesse Helms
United States Senator

Unofficial Business

The Capitol Building
Capitol Hill
Washington, D.C. 20510

RECEIVED
GENERAL COUNSEL
81 FEB20 P4:42

8304042060 5

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pinpoint the recent evening news broadcast by one of the major networks which ended with an incredibly tasteless and vicious attack on Ronald Reagan.

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Because the liberals control the news media, paid air time is the only way to reach the American people with the truth.

Will you help us do this?

Will you do two things today?

First, will you send Americans for Reagan, in the enclosed

more...

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envelope, your maximum pledge and support of our fall campaign to buy T.V. time for Governor Ronald Reagan?

Second, will you match the pledge with an immediate contribution to this vital effort?

I hope you can send $25 now and promise $50 later.

Or perhaps you can send $50 now and pledge $100 later.

Whether you can send $20, $50, $75, $500 or even $1,000 right now, please let me know your decision.

This time, because our cause is so important, I am asking you to dig down deep.

Americans for Reagan must have $26,800 in the next 30 days for the television campaign -- to purchase air time for T.V. ads.

Think of the future. Think of the consequences.

What kind of future will our children and grandchildren have if 20% interest rates and 18% inflation continue?

Or even more frightening, think of the consequences if our nation continues to be ridiculed and our leaders continue to stand by as the communist war machine advances.

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His official campaign cannot take one contribution from you or from me once he has won the Republican Presidential nomination. He will have to rely on a completely independent effort. So please, send your contribution to Americans for Reagan. Do it today.

I am anxiously waiting to hear from you. God bless you.

Sincerely yours,

Jesse Helms

Jesse Helms
United States Senator

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NO POSTAGE NECESSARY IF MAILED IN THE UNITED STATES

BUSINESS REPLY MAIL

First Class Permit No. 1439 Raleigh, N.C.

Postage Will Be Paid By:

Senator Jesse Helms
Americans for Reagan
3825 Barret Drive, Suite 300, Dept. 24
Raleigh, North Carolina 27609

PR

POST GRAM

NATIONWIDE ELECTRONIC DATA COMMUNICATIONS
AR 10/11/80 8SM A18 9027761

RECEIVED
FEB 20 P4:42
GENERAL COUNSEL

83040420609

REMEMBER JIMMY CARTER'S GIVE-AWAY OF OUR PANAMA CANAL.

REMEMBER JIMMY CARTER'S 18% INFLATION AND 22% INTEREST RATES.

REMEMBER JIMMY CARTER'S FOUR STRAIGHT YEARS OF CUTTING DEFENSE SPENDING. AND REMEMBER OUR HOSTAGES IN IRAN.

YOUR $25 TO AMERICANS FOR REAGAN WAS GREAT HELP. BUT AFTER NOVEMBER 4, 1980 THERE WILL BE NO TOMORROW.
IT IS EITHER RONALD REAGAN OR JIMMY CARTER.
IT IS NOW OR NEVER.

IF JIMMY CARTER WINS AMERICA WILL HAVE FOUR MORE YEARS OF APPEASEMENT. FOUR MORE YEARS OF ECONOMIC CATASTROPHE.

MY FRIEND, NOW AS NEVER BEFORE YOU HAVE THE POWER TO SHAPE AMERICA'S FUTURE.

DON'T LET IT BE TAKEN AWAY FROM YOU. DON'T LET JIMMY CARTER'S DISTORTIONS GO WITHOUT AN ANSWER.

DON'T LET JIMMY CARTER'S PERSONAL ATTACKS ON RONALD REAGAN GO WITHOUT AN ANSWER.

AMERICANS FOR REAGAN MUST BUY TV TIME TO ANSWER JIMMY CARTER. EVERY AMERICAN MUST KNOW THE TRUTH.

MY FRIEND, NEED YOUR $50 TO BUY FINAL ELECTION EVE TV TIME FOR RONALD REAGAN WIN.

URGENT. PLEASE — MUST HAVE YOUR ANSWER WITHIN 48 HOURS. AMERICA NEEDS REAGAN. ONLY GOOD AMERICANS LIKE YOU CAN MAKE THAT HAPPEN.

PLEASE MAKE YOUR CHECK OUT NOW TO: REAGAN TV EMERGENCY FUND.

REMEMBER TOMORROW WILL BE TO LATE.

S/SENATOR JESSE HELMS

POST GRAM REPLY

NATIONWIDE ELECTRONIC DATA COMMUNICATIONS

TO:

I AGREE, IF JIMMY CARTER WINS REELECTION AMERICA WILL HAVE FOUR MORE YEARS OF APPEASEMENT, FOUR MORE YEARS OF ECONOMIC CATASTROPHE.

YES AMERICA NEEDS RONALD REAGAN AS PRESIDENT. I UNDERSTAND THIS IS FINAL HOUR FOR DECISION. TO HELP AMERICANS FOR REAGAN BUY EMERGENCY TV AIR TIME TO ELECT RONALD REAGAN PRESIDENT I ENCLOSE MY CONTRIBUTION PAYABLE TO REAGAN TV EMERGENCY FUND FOR:

$_____

/_/MR /_/MRS /_/MISS _____

ADDRESS _____

CITY _____ STATE _____ ZIP _____

TELEPHONE _____ AREA CODE _____

THE FEDERAL ELECTION COMMISSION REQUIRES THAT WE ASK THE FOLLOWING:

OCCUPATION _____

PLACE OF BUSINESS _____

NOT PREPARED OR MAILED AT GOVT EXPENSE; AMERICANS FOR REAGAN IS AN INDEPENDENT PROJECT OF THE CONGRESSIONAL CLUB AND IS NOT AUTHORIZED BY ANY PRESIDENTIAL CANDIDATE. THE FOREGOING MATERIAL AND ENCLOSURES ARE AUTHORIZED AND PAID FOR BY THE CONGRESSIONAL CLUB, THOMAS F. ELLIS, CHAIRMAN, CARTER WRENN, TREASURER.

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NO POSTAGE
NECESSARY
IF MAILED
IN THE
UNITED STATES

BUSINESS REPLY MAIL
First Class Permit No. 1439 Raleigh, N.C.

Postage Will Be Paid By:

Senator Jesse Helms, Honorary Chairman,
Americans for Reagan

POST GRAM REPLY

3825 Barrett Drive, Suite 300, Dept. 24
Raleigh, North Carolina 27609

83040420

RUSH

TIME a.m. p.m.

COVINGTON & BURLING
888 SIXTEENTH STREET, N.W.
WASHINGTON, D. C. 20006

BY HAND

Anne Weissenborn, Esq.
Office of the General Counsel
Federal Election Commission
1325 K Street, N.W.
7th Floor
Washington, D.C. 20463

GCC#3976

COVINGTON & BURLING
888 SIXTEENTH STREET, N. W.
WASHINGTON, D. C. 20006

TELEPHONE
(202) 452-6000

WRITER'S DIRECT DIAL NUMBER
(202) 452-4766

TWX: 710-822-0005
TELEX: 89-593
CABLE: COVLING

FEB 13 2 08 PM '81
RECEIVED
GENERAL COUNSEL

February 13, 1981

Anne Weissenborn, Esq.
Office of the General Counsel
Federal Election Commission
1325 K Street, N.W.
7th Floor
Washington, D.C. 20463

Re: Matters Under Review 1252 and 1299

Dear Ms. Weissenborn:

This is to confirm that you have agreed to grant to the Congressional Club an extension of time in which to complete its response to the subpoena to produce certain documents and materials and to answer written questions issued by the Federal Election Commission and transmitted to the Congressional Club on October 20, 1980. Pursuant to our agreement, on or before February 20, 1981, the Congressional Club will supplement its response to Interrogatory A-4 and will deliver to your office copies of the documents in its possession that were used to solicit funds with respect to the project Americans For Reagan.

It bears emphasis, however, that the exercise by the Congressional Club of its rights as a respondent in the above-entitled proceeding and its responses to the Commission's subpoena and interrogatories are not intended, and should not be construed, as an acknowledgment by the Congressional Club of the Commission's power under the Constitution to regulate or to scrutinize such political advertisements, or as a waiver of the Congressional Club's rights to challenge the same in a court of law.

If you have any further questions in this matter, please let me know.

Sincerely,

Scott D. Gilbert

SDG/dg

8304042061

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 29, 1981

Mr. Brice M. Clagett, Esquire
Counsel, North Carolina Congressional Club
Covington and Burling
888 Sixteenth Street, N.W.
Washington, D.C. 20006

Re: MUR 1252

Dear Mr. Clagett,

On January 21, 1981, this Office received a telephone call from Mr. John R. Bolton during which we were informed that he is planning a leave of absence from your firm and that you will be assuming responsibility for representing the North Carolina Congressional Club ("NCCC") in MUR 1252.

As you are undoubtedly aware, on October 20, 1980, this Office transmitted to Mr. Bolton a subpoena and order authorized by the Commission requiring NCCC to produce certain documents and to answer certain written questions. The Commission set November 12, 1980, as the return date. On October 27, 1980, Mr. Bolton requested an extention of time until November 21, 1980, to respond to the subpoena and order; this request was denied by the Commission on November 6, 1980. On November 25, 1980, Mr. Bolton wrote a letter to this Office in which he provided written responses to two document production requests contained in the subpoena and to all but one of the interrogatories. With regard to Specification 2 of the subpoena and to Interrogatory A-4, he asked for a statement regarding the need for the Commission to "examine the contents of political advertisements."

On December 19, 1980, during a telephone conversation with Ms. Patricia Bak, Mr. Bolton indicated that NCCC had objections to certain aspects of the subpoena and order. Ms. Bak suggested that these objections to put in writing; however, no such objections have been received. Ms. Bak also indicated the willingness of Commission counsel to meet with him to discuss all questions which he might have concerning this matter. No such meeting has been requested. On January 22, 1981, Ms. Anne Weissenborn, the attorney now assigned to this matter attempted to reach you by telephone to discuss this matter; her call has not yet been returned.

Accordingly, NCCC is directed to produce for inspection and copying the documents requested in Specification 2 of the

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Commission subpoena, namely "(a)ll documents and materials concerning any soliciation or request for funds for Americans for Reagan or by NCCC which related in any way to the furtherance of the election of Ronald Reagan as the presidential nominee of the Republican Party or the general election of Ronald Reagan as president in 1980 or which would aid in the defeat of any other 1980 presidential candidate." Such production is to be made at Room 706, 1325 K Street, N.W., Washington, D.C. at 10:00 a.m. on February 9, 1981, and on all subsequent business days thereafter required to complete inspection. An answer to Interrogatory A-4 must be submitted to the above address within ten (10) days of your receipt of this letter.

If you have any questions, please contact Ms. Weissenborn at (202) 523-5071.

Sincerely,

Charles N. Steele
General Counsel

8304042061

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

December 3, 1980

John R. Bolton, Esquire
Covington and Burling
888 16th Street, N.W.
Washington, D.C. 20006

Re: MUR 1252

Dear Mr. Bolton:

On September 25, 1980 you were notified of the Commission's findings concerning your client, North Carolina Congressional Club (NCCC), with respect to the complaint filed by the Carter-Mondale Reelection Committee and captioned MUR 1252.

This letter is to further notify you that, upon reconsideration of the complaint in MUR 1252, the Commission has found reason to believe NCCC violated 26 U.S.C. § 9012(f) by making excessive independent expenditures in support of Ronald Reagan. A report on the Commission's finding is attached. You may also submit any additional factual or legal materials which you believe are relevant to the Commission's consideration of this matter. In the absence of such additional information or further explanation of circumstances which demonstrate that no further action should be taken against NCCC, the Commission may find probable cause to believe that a violation has occurred, and proceed with formal conciliation. Of course, this does not preclude the settlement of this matter through informal conciliation prior to a finding of probable cause to believe if you so desire.

This matter will remain confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public. If you have any questions with respect to this or any other Commission action, please call Marsha G. Gentner, Anne A. Weissenborn, or Patricia F. Bak at (202) 523-5071.

Sincerely,

John Warren McGarry
Vice-Chairman

Enclosure

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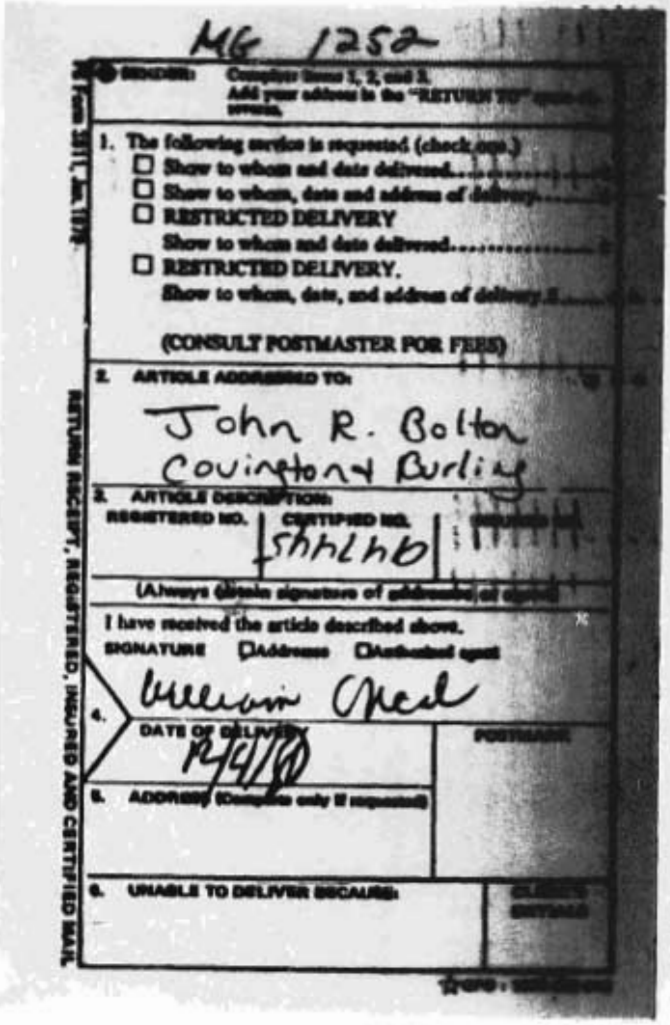
MG 1252



SENDER: Complete items 1, 2, and 3.
Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one.)
- ☐ Show to whom and date delivered.....
- ☐ Show to whom, date and address of delivery.....
- ☐ RESTRICTED DELIVERY
  Show to whom and date delivered.....
- ☐ RESTRICTED DELIVERY.
  Show to whom, date, and address of delivery.....

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
John R. Bolton
Covington & Burling

3. ARTICLE DESCRIPTION:
REGISTERED NO. | CERTIFIED NO. 5HHLHB | INSURED NO.

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐Addressee ☐Authorized agent
William Neal

4. DATE OF DELIVERY 12/4/80 POSTMARK

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE: CLERK'S INITIALS

PS Form 3811, Jan. 1979 RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

8304042061 7

FEDERAL ELECTION COMMISSION

NOTIFICATION OF REASON TO BELIEVE FINDING

DATE December 3, 1980

MUR NO. 12 52

STAFF MEMBER(S) & TEL. NO.

Marsha G. Gentner

Anne A. Weissenborn
(202) 523-5071

COMPLAINANT'S NAME Carter/Mondale Reelection Committee
Democratic National Committee

RESPONDENT'S NAME North Carolina Congressional Club

BACKGROUND

On July 2, 1980, the Carter-Mondale Reelection Committee and the Democratic National Committee (hereinafter "Complainants") submitted a complaint which alleges that the North Carolina Congressional Club (hereinafter "NCCC") is violating 26 U.S.C. § 9012(f) by making excessive independent expenditures on behalf of the candidacy of Ronald Reagan and both 2 U.S.C. § 9012(f) and 2 U.S.C.§ 441a(a) by making excessive in-kind contributions to Ronald Reagan and his principal campaign committee.

PRELIMINARY
FACTUAL BASIS AND LEGAL ANALYSIS

26 U.S.C. § 9012(f) prohibits unauthorized committees from knowingly and willfully incurring expenditures in excess of $1000 to further the election of candidates of a political party for President and Vice-President who are eligible to receive public funds when such expenditures would constitute qualified campaign expenses if incurred by an authorized committee of such candidates. Therefore, if an unauthorized committee expends more that $1000 on behalf of such a candidate, that committee has violated 26 U.S.C. § 9012(f), whether or not the committee is "independent" of the candidate's authorized committee.

As the complaint demonstrates, NCCC is soliciting funds in excess of $1,000 to be used "to purchase radio and television time in which to air advertisements supporting Ronald Reagan." The Office of General Counsel has recommended that the Commission find reason to believe that NCCC has violated 26 U.S.C. § 9012(f) by making excessive independent expenditures.

COMMISSION DETERMINATION

Based on the foregoing analysis, the Federal Election Commission has found that the North Carolina Congressional Club has violated 26 U.S.C. § 9012(f) by making excessive independent expenditures.

COVINGTON & BURLING
888 SIXTEENTH STREET, N.W.
WASHINGTON, D.C. 20006

TELEPHONE
(202) 452-6000

WRITER'S DIRECT DIAL NUMBER
(202)452-6418

TWX: 710-822-0006
TELEX: 89-593
CABLE: COVLING

RECEIVED GCC #3422
FEC MAIL ROOM
80 NOV 26 P3:34

HAND DELIVERED

November 25, 1980

Charles N. Steele, Esq.
General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: Matters Under Review 1252 and 1299

Dear Mr. Steele:

This letter is in response to the subpoena to produce certain documents and materials and to answer written questions issued by the Federal Election Commission ("FEC") to the Congressional Club.

We provide the following written responses to the two document-production items:

1. There are no documents "concerning or relating to the formation, organization, planning or undertaking of Americans for Reagan" because that project was only an aspect of the Congressional Club's political activity. See response to Interrogatory A(1), infra.

2. Before responding to this item, we would like a statement from the FEC concerning the need for it to examine the contents of political advertisements.

We provide the following responses to the FEC's interrogatories:

A. Americans for Reagan is a project of the Congressional Club.

(1) Americans for Reagan was never "organized" or "formed". The first fundraising letter was dated April 30, 1980.

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(2) Americans for Reagan maintains no bank accounts or accounting of receipts and expenditures separate and apart from the Congressional Club.

(3) Americans for Reagan does not employ a staff separate and apart from that of the Congressional Club.

(4) See response to document production request Two, supra.

(5) Monies from checks received by the Congressional Club made payable to the Congressional Club were used in the Americans for Reagan project.

(6) "Congressional Club" is the name of the account.

B. Thomas F. Ellis, Chairman of the Congressional Club; Carter Wrenn, Treasurer of the Congressional Club.

If you have any further questions in this matter, please let me know. We believe that the foregoing responses vividly demonstrate that Americans for Reagan is a project of the Congressional Club. Accordingly, there can be no violation of 2 U.S.C. § 432(e)(4) or any other provision of the Federal Election Campaign Act, as amended. We believe these MURs should be dismissed forthwith.

Sincerely yours,

John R. Bolton

John R. Bolton

Enclosures

9304042060

COVINGTON & BURLING
888 SIXTEENTH STREET, N. W.
WASHINGTON, D. C. 20006

830420621

HAND DELIVER TO:

Charles N. Steele, Esq.
General Counsel
Federal Election Commission
1325 K Street, N.W. 7th floor
Washington, D.C.

COVINGTON & BURLING
888 SIXTEENTH STREET, N. W.
WASHINGTON, D. C. 20006

TELEPHONE
(202) 452-6000

WRITER'S DIRECT DIAL NUMBER
(202) 452-6418

TWX: 710-822-0006
TELEX: 89-593
CABLE: COVLING

RECEIVED
FEDERAL ELECTION COMMISSION
GENERAL COUNSEL
80 NOV 26 P 3:35

GCC 3421

November 25, 1980

Charles N. Steele, Esq.
General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: Matters Under Review 1252 and 1299

Dear Mr. Steele:

This letter is in response to the subpoena to produce certain documents and materials and to answer written questions issued by the Federal Election Commission ("FEC") to the Congressional Club.

We provide the following written responses to the two document-production items:

1. There are no documents "concerning or relating to the formation, organization, planning or undertaking of Americans for Reagan" because that project was only an aspect of the Congressional Club's political activity. See response to Interrogatory A(1), infra.

2. Before responding to this item, we would like a statement from the FEC concerning the need for it to examine the contents of political advertisements.

We provide the following responses to the FEC's interrogatories:

A. Americans for Reagan is a project of the Congressional Club.

(1) Americans for Reagan was never "organized" or "formed". The first fundraising letter was dated April 30, 1980.

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(2) Americans for Reagan maintains no bank accounts or accounting of receipts and expenditures separate and apart from the Congressional Club.

(3) Americans for Reagan does not employ a staff separate and apart from that of the Congressional Club.

(4) See response to document production request Two, supra.

(5) Monies from checks received by the Congressional Club made payable to the Congressional Club were used in the Americans for Reagan project.

(6) "Congressional Club" is the name of the account.

B. Thomas F. Ellis, Chairman of the Congressional Club; Carter Wrenn, Treasurer of the Congressional Club.

If you have any further questions in this matter, please let me know. We believe that the foregoing responses vividly demonstrate that Americans for Reagan is a project of the Congressional Club. Accordingly, there can be no violation of 2 U.S.C. § 432(e)(4) or any other provision of the Federal Election Campaign Act, as amended. We believe these MURs should be dismissed forthwith.

Sincerely yours,

John R. Bolton

John R. Bolton

Enclosures

8304042062 3

COVINGTON & BURLING
888 SIXTEENTH STREET, N. W.
WASHINGTON, D. C. 20006

8304204024

HAND DELIVER TO:

Patricia Bak, Esq.
Federal Election Commission
1325 K Street, N.W. 7th floor
Washington, D.C.

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

HAND DELIVERY

November 10, 1980

John R. Bolton, Esquire
COVINGTON & BURLING
888 16th Street, N.W.
Washington, D.C. 20006

Re: MURs 1252 and 1299

Dear Mr. Bolton:

This Office is in receipt of both your letter of October 21, 1980 requesting an extension of time to respond to MUR 1299 and to comment further on the issues concerning 2 U.S.C. § 432(e)(4) in MUR 1252, and your letter of October 27, 1980 requesting an extension of time until November 21, 1980 to respond to the Commission's subpoena and order which were received by you on October 21, 1980.

By letter dated October 23, 1980, this Office informed you of the Commission's vote to deny your request for an extension of time until October 24, 1980 in which to submit North Carolina Congressional Club's ("NCCC") response to the complaint filed in MUR 1299. By that same letter you were informed that on October 15, 1980, the Commission also voted to merge the complaint in MUR 1299 with MUR 1252 and to treat them as a single investigatory matter.

While the Commission will not grant an extension of time within which to respond to the Commission's finding of reason to believe that your client, NCCC, violated 2 U.S.C. § 432(e)(4) in connection with MUR 1252, you are of course welcome to submit whatever comments you might wish to submit in connection with the Commission's investigation of this matter. In this regard, the Commission notes the statutory opportunity granted to you to submit a brief stating the position of NCCC on the

8304042062 5

legal and factual issues raised in this case and to respond to the Office of General Counsel's brief which you will receive should the General Counsel ultimately recommend to the Commission that it proceed to a vote of probable cause in connection with this matter. See, 2 U.S.C. § 437g(a)(3).

Finally, the Commission on November 6 , 1980 voted to deny your request of October 27, 1980 for an extension of time until November 21, 1980 to respond to the Commission's subpoena and order. As was indicated by our prior correspondence in response to your previous requests for extensions of time, the Commission is under a statutory duty to conduct its investigations expeditiously and therefore feels that it cannot sanction any delay in compliance with its subpoena or order where it has received no other responsive information or documentation from the respondent.

If you should have any questions about this or any other Commission action, please call Ms. Patricia F. Bak at (202) 523-4060.

Sincerely,

Charles N. Steele
General Counsel

8304042062 6

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

HAND DELIVERY

John R. Bolton, Esquire
COVINGTON & BURLING
888 16th Street, N.W.
Washington, D.C. 20006

Re: MURs 1252 and 1299

Dear Mr. Bolton:

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8304042062 7

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Sincerely,

Charles N. Steele
General Counsel

8304042062 8

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	MURs 1252 and 1299
North Carolina Congressional Club (NCCC)	)	

AMENDED CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on November 6, 1980, the Commission decided by a vote of 5-0 to take the following actions regarding MURs 1252 and 1299:

1. Deny NCCC's request for extension of time to respond to the Commission's finding of RTB in MUR 1252 and deny NCCC's request for extension of time to respond to the Commission's order and subpoena.

2. Approve the letter as attached to the General Counsel's November 4, 1980 memorandum.

Commissioners Aikens, Harris, McGarry, Reiche, and Tiernan voted affirmatively for the decision.

Commissioner Friedersdorf submitted an objection for the record at 9:25, November 17, 1980, and requested the certification be amended to reflect this vote.

Attest:

11-17-80
Date

Marjorie W. Emmons
Secretary to the Commission

Received in Office of the Commission Secretary: 11-4-80, 12:42
Circulated on 48 hour vote basis: 11-4-80, 4:00

8304042062 9

48 HOUR TALLY SHEET

FEDERAL ELECTION COMMISSION 80 NOV 17 A 9: 25

1325 K STREET N.W.
WASHINGTON, D.C. 20463

Date and Time Transmitted: TUESDAY, 11-4-80
4:00

Commissioner FRIEDERSDORF, AIKENS, TIERNAN, McGARRY, REICHE, HARRIS

RETURN TO OFFICE OF COMMISSION SECRETARY BY: THURSDAY, NOVEMBER 6, 1980
4:00 PM

MUR No. 1299 & 1252 - Memorandum to the Commission dated 11-4-80

( ) I approve the recommendation

(✓) I object to the recommendation

COMMENTS: For the record

Date: 11-17-80 Signature: Mark L. Fried[illegible] by SCA

A DEFINITE VOTE IS REQUIRED AND ALL SHEETS SIGNED AND DATED. PLEASE RETURN ONLY THE VOTE SHEETS TO THE OFFICE OF THE COMMISSION SECRETARY NO LATER THAN THE DATE AND TIME SHOWN ABOVE.

8304040645

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	MURs 1252 and
	)	1299
North Carolina Congressional Club (NCCC)	)	
	)	

CERTIFICATION

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1. Deny NCCC's request for extension of time to respond to the Commission's finding of RTB in MUR 1252 and deny NCCC's request for extension to time to respond to the Commission's order and subpoena.

2. Approve the letter as attached to the General Counsel's November 4, 1980 memorandum.

Commissioners Aikens, Harris, McGarry, Reiche, and Tiernan voted affirmatively in the above-captioned matter.

Attest:

11-6-80
Date

Marjorie W. Emmons
Marjorie W. Emmons
Secretary to the Commission

Received in Office of the Commission Secretary: 11-4-80, 12:42
Circulated on 48 hour vote basis: 11-4-80, 4:00

8304042063 1

November 4, 1980

MEMORANDUM TO: Marjorie W. Emmons

FROM: Elissa T. Garr

SUBJECT: MURs 1299 and 1252

Please have the attached Memo distributed to the Commission on a 48 hour tally basis. Thankyou.

8304042063?

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

80 NOV 4 P12: 42

November 4, 1980

MEMORANDUM

TO: The Commission

FROM: Charles N. Steele
General Counsel

SUBJECT: Recommendation to deny NCCC's request for an extension of time to respond to the complaint filed in MUR 1299, to respond to the Commission's finding of reason to believe NCCC violated 2 U.S.C. § 432(e)(4) in MUR 1252, and to respond to the Commission's subpoena and order.

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By letters dated October 21, 1980 and October 27, 1980, Counsel for NCCC, John Bolton, renewed his request for an extension of time within which to respond to the complaint filed in MUR 1299 and requested extensions of time within which to respond to the Commission's finding of RTB in MUR 1252, and its subpoena and order. Obviously the letter approved by the Commission and sent to Mr. Bolton on October 23, 1980, denying his request for an extension of time within which to respond to MUR 1299 was not received by him prior to his renewed request of October 21.

The Office of General Counsel believes that the two requests for production of documents and two interrogatories posed respondent NCCC are not so burdensome to merit any further delay in the investigation of the violation alleged to have been committed by this respondent, or to preclude one of Mr. Bolton's associates from handling the matter in his absence.

Recommendation:

1. Deny NCCC's request for extension of time to respond to the Commission's finding of RTB in MUR 1252 and deny NCCC's request for extension of time to respond to the Commission's order and subpoena.

2. Approve attached letter.

Attachments
I. Draft letter to Bolton
II. Bolton's request of October 21, 1980
III. Bolton's request of October 27, 1980

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

HAND DELIVERY

John R. Bolton, Esquire
COVINGTON & BURLING
888 16th Street, N.W.
Washington, D.C. 20006

Re: MURs 1252 and 1299

Dear Mr. Bolton:

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By letter dated October 23, 1980, this Office informed you of the Commission's vote to deny your request for an extension of time until October 24, 1980 in which to submit North Carolina Congressional Club's ("NCCC") response to the complaint filed in MUR 1299. By that same letter you were informed that on October 15, 1980, the Commission also voted to merge the complaint in MUR 1299 with MUR 1252 and to treat them as a single investigatory matter.

While the Commission will not grant an extension of time within which to respond to the Commission's finding of reason to believe that your client, NCCC, violated 2 U.S.C. § 432(e)(4) in connection with MUR 1252, you are of course welcome to submit whatever comments you might wish to submit in connection with the Commission's investigation of this matter. In this regard, the Commission notes the statutory opportunity granted to you to submit a brief stating the position of NCCC on the

8304042063 4

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Finally, the Commission on , 1980 voted to deny your request of October 27, 1980 for an extension of time until November 21, 1980 to respond to the Commission's subpoena and order. As was indicated by our prior correspondence in response to your previous requests for extensions of time, the Commission is under a statutory duty to conduct its investigations expeditiously and therefore feels that it cannot sanction any delay in compliance with its subpoena or order where it has received no other responsive information or documentation from the respondent.

If you should have any questions about this or any other Commission action, please call Ms. Patricia F. Bak at (202) 523-4060.

Sincerely,

Charles N. Steele
General Counsel

8304042063 5

COVINGTON & BURLING
888 SIXTEENTH STREET, N. W.
WASHINGTON, D. C. 20006

TELEPHONE
(202) 452-6000

WRITER'S DIRECT DIAL NUMBER
(202) 452-6418

TWX: 710-822-0005
TELEX: 89-593
CABLE: COVLING

Attachment II

HAND DELIVER

October 21, 1980

Marsha Gentner, Esquire
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: MURs 1252 and 1299

Dear Ms. Gentner:

I would like to request an extension of time to respond to MUR 1299 and to comment further on the issues concerning 2 U.S.C. § 432(e)(4) in MUR 1252 until November 14.

As I indicated to you in my letter of October 3, 1980, I have been in trial before the United States District Court for the Western District of Oklahoma since September 8. Opposing counsel did not begin their case in chief until October 14, and their first witness has not yet completed his testimony. There is obviously no possibility that the trial will conclude before October 24. I trust that you will notify me if there is any problem with granting the extension requested.

Sincerely yours,

John R. Bolton /af

John R. Bolton

(Dictated but not read by
Mr. Bolton)

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OCT 21 A10:10

Gentner

HAND DELIVERED

9109?42

Attachment III 6 pp. 3?

80 OCT 27 P12:07

COVINGTON & BURLING
888 SIXTEENTH STREET, N. W.
WASHINGTON, D. C. 20006

TELEPHONE
(202) 452-6000
WRITER'S DIRECT DIAL NUMBER
(202) 452-6418

TWX: 710-822-0006
TELEX: 89-593
CABLE: COVLING

October 27, 1980

HAND DELIVERED

Marsha Gentner, Esq.
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: MURs 1252 and 1299

Dear Ms. Gentner:

By letter dated October 20, 1980, the General Counsel transmitted to me (as attorney for the Congressional Club) a subpoena to produce certain documents and materials and an order to answer certain written questions concerning issues involving 2 U.S.C. § 432(e)(4). As I indicated to you in our telephone conversation last week, I am still in trial before the United States District Court for the Western District of Oklahoma. We have now completed our seventh week of trial. Opposing counsel in that case have tentatively stated that they expect their case in chief to last at least three more weeks.

Accordingly, I would like to request an extension of time until November 21, 1980 to respond to the subpoena and order (which I received on October 21). We do intend to respond to the subpoena and order. In addition, we plan to advance at that time further arguments as to why the Section 432(e)(4) complaints against the Congressional Club should be dismissed. I trust that you will notify me if there is any problem with granting the extension requested.

Sincerely yours,

John R. Bolton /af

John R. Bolton

(Dictated but not read by Mr. Bolton)

80 OCT 27 P12:22

RECEIVED

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HAND DELIVERED

910942

RECEIVED

MUR# 322

80 OCT 27 P12:07

COVINGTON & BURLING
888 SIXTEENTH STREET, N. W.
WASHINGTON, D. C. 20006

TELEPHONE
(202) 452-6000

WRITER'S DIRECT DIAL NUMBER
(202) 452-6418

TWX: 710-822-0005
TELEX: 89-593
CABLE: COVLING

October 27, 1980

HAND DELIVERED

Marsha Gentner, Esq.
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: MURs 1252 and 1299

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Sincerely yours,

John R. Bolton /af

John R. Bolton

(Dictated but not read by Mr. Bolton)

80 OCT 27 P12:22

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John R. Bolton
COVINGTON & BURLING
888 SIXTEENTH STREET, N. W.
WASHINGTON, D. C. 20006

HAND DELIVER

RECEIVED
88 OCT 27 P12:07
HAND DELIVERED

Marsha Gentner, Esq.
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

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Copy

HAND DELIVERED

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6001 322

80 OCT 27 P12:07

COVINGTON & BURLING
888 SIXTEENTH STREET, N. W.
WASHINGTON, D. C. 20006

TELEPHONE
(202) 452-6000

WRITER'S DIRECT DIAL NUMBER
(202) 452-6418

TWX: 710-822-0006
TELEX: 89-593
CABLE: COVLING

October 27, 1980

HAND DELIVERED

Marsha Gentner, Esq.
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

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Sincerely yours,

John R. Bolton /af

John R. Bolton

(Dictated but not read by Mr. Bolton)

80 OCT 27 P12:22

8304042064O

AMERICANS CONCERNED FOR THE JUDICIARY
[illegible] L Street, N.W., Suite 800
[illegible], D.C. 20036

8304042O

Charles M. Steele, Esq.
General Counsel
Federal Election Commission
1325 K Street, N. W.
Washington, D. C. 20463

80OCT28 P4:22

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 23, 1980

HAND DELIVERED

John R. Bolton, Esquire
Covington and Burling
888 16th Street, N.W.
Washington, D.C. 20006

RE: MUR 1252 and MUR 1299

Dear Mr. Bolton:

This Office has received your letter of October 3, 1980 requesting an extension of time until October 24, 1980 in which to submit North Carolina Congressional Club's response to the complaint filed in the above referenced action. As you are probably aware, the Commission is under a statutory duty to conduct its investigations expeditiously, and therefore feels it cannot sanction any delay in the processing or consideration of this matter. Accordingly, on October 15, 1980, the Commission voted to deny your request for an extension. However, the Commission also voted on that date to merge the complaint in MUR 1299 with MUR 1252, and to treat them as a single investigatory matter.

If you have any questions about this or any other Commission action, please call Marsha Gentner at 523-5071.

Sincerely,

Charles N. Steele
General Counsel

8304042064 2

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

HAND DELIVERED

John R. Bolton, Esquire
Covington and Burling
888 16th Street, N.W.
Washington, D.C. 20006

RE: MUR 1252 and MUR 1299

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If you have any questions about this or any other Commission action, please call Marsha Gentner at 523-5071.

Sincerely,

Charles N. Steele
General Counsel

MUR
10/22/80

8304042064 3

GCC# 3059

COVINGTON & BURLING
888 SIXTEENTH STREET, N. W.
WASHINGTON, D. C. 20006

TELEPHONE
(202) 452-6000

WRITER'S DIRECT DIAL NUMBER
(202) 452-6418

TWX: 710-822-0006
TELEX: 89-593
CABLE: COVLING

HAND DELIVER

October 21, 1980

Marsha Gentner, Esquire
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: MURs 1252 and 1299

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Sincerely yours,

John R. Bolton /af

John R. Bolton

(Dictated but not read by Mr. Bolton)

0 OCT 21 A10:10

8304042064

COVINGTON & BURLING
888 SIXTEENTH STREET, N. W.
WASHINGTON, D. C. 20006

8304042045

HAND DELIVER TO:

Marsha Gantner, Esq.
Office of the General
Counsel
1325 K Street, N.W. - 3rd floor
Washington, D.C. 20463

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 20, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. John Bolton
Covington & Burling
888 16th Street, N.W.
Washington, D.C. 20006

Re: Matter Under Review (MUR) 1252(80)

Dear Mr. Bolton:

Enclosed is a subpoena to produce certain documents and materials and order to answer written questions issued by the Federal Election Commission ("Commission")to your client, North Carolina Congressional Club ("NCCC").

The subpoena requires that production of specified documents be made at the time and place stated therein and that responses to the interrogatories be propounded to the Commission within ten (10) days of your receipt of the enclosed order. If NCCC wishes to produce the documents requested by mailing them to the Commission, please have them mailed by certified mail so that their receipt may be verified.

If you have any questions, please contact staff attorney Ms. Marsha Gentner at (202) 523-5071 or Ms. Patricia F. Bak at (202) 523-4060.

8304012064 6

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

10/17/80

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. John Bolton
Covington & Burling
888 16th Street, N.W.
Washington, D.C. 20006

Re: Matter Under Review (MUR) 1252(80)

Dear Mr. Bolton:

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If you have any questions, please contact staff attorney Ms. Marsha Gentner at (202) 523-5071 or Ms. Patricia F. Bak at (202) 523-4060.

Sincerely,

Charles N. Steele
General Counsel

Enclosures: Subpoena

8304042064 7

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

SUBPOENA TO PRODUCE DOCUMENTS AND MATERIALS
AND ORDER TO ANSWER WRITTEN ANSWERS

TO:
North Carolina Congressional Club
3825 Barret Drive
Raleigh, North Carolina 27609

RE: MUR 1252

8304042064 8

At the instance of the Federal Election Commission, pursuant to 2 U.S.C. §§ 437d(a)(1) and (3), the North Carolina Congressional Club is hereby ordered to produce for inspection and copying all documents and materials listed below that are in the possession or control of the North Carolina Congressional Club or of its officers, agents, staff members, volunteers or employees. Production is to be made on November 12, 1980, at the Office of General Counsel of the Federal Election Commission at 1325 K Street, N.W. Washington, D.C. at 10:00 a.m. In addition, the North Carolina Congressional Club is hereby ordered to submit responses in writing and under oath to the interrogatories propounded herein, to the Federal Election Commission within ten (10) days of its receipt of this order.

As used in this subpoena, the terms listed below are defined as follows:

1. The term "documents and materials" shall mean the original, all copies, and drafts of writings of any kind, printed, audio, visual, or electronic materials including but not limited to correspondence, memoranda, reports, transcripts, minutes, pamphlets, leaflets, notes, letters, lists, telexes, telegrams, messages (including reports, notes memoranda and any other documentation of telephone conversations and conferences), calendar and diary entries, contracts, data, agendas, articles, visual aides, computer print-outs, account statements, billing forms, receipts, checks and other negotiable paper, solicitation materials, records and compilations in the possession, custody or control of the North Carolina Congressional Club. Designated "documents and materials" are to be taken as including all attachments, enclosures and other documents that are attached to, relate to, or refer to such designated "documents and materials."

2. "Identify" with respect to individuals shall mean to give the full name, last known residence address of such individual, the last known place of business where such individual is or was employed, the title of the job or position held with the entity in question, and the dates of such service.

3. "North Carolina Congressional Club" or "NCCC" shall mean its predecessors, affiliates, committees, subcommittees, divisions, branches, projects, as well as any other bodies which conduct business on behalf of NCCC, and its officers, agents, employees, staff, and volunteers.

4. "Americans for Reagan" shall mean what NCCC has described as a "project" of the NCCC.

5. All references to the "FEC" shall mean the Federal Election Commission, its auditors, attorneys, and other employees.

6. "Organizer" with reference to a project or group, shall mean any person who has directly or indirectly participated in the formation, planning, structure or organization of the project or group in question, including, but not limited to, attendance or participation in any meetings, discussions or communications concerning the project or group from the period from January 1980 to the group or project's inception.

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7. The term "concerning" with reference to a subject or object shall mean mentioning, discussing, or directly or indirectly regarding, referring, or relating in any way to that subject or object.

If any document called for herein is withheld under a claim of privilege or objection, please furnish a list identifying each such document for which the privilege or objection is claimed, together with the following information:

(a) a description of the subject matter;
(b) the date of the document;
(c) the name and title of the author;
(d) the name and title of the person to whom the document was addressed;
(e) the name and title of the person to whom the document was actually sent;
(f) the identity of any other person who read all or aprt of the document;
(g) the number of pages;
(h) the paragraph of this subpoena to which the document is otherwise responsive, and
(i) the nature of the claimed objection or privilege.

Please produce in their entirety the following:

1. All documents and materials concerning or relating to the formation, organization, planning, or undertaking of Americans for Reagan.

2. All documents and materials concerning any solicitation or request for funds for Americans for Reagan or by NCCC which relate in any way to the furtherance of the election of Ronald Reagan as the presidential nominee of the Republican Party or the general election of Ronald Reagan as president in 1980 or which would aid in the defeat of any other 1980 presidential candidate.

8304042065C

Please answer the following interrogatories:

A. Describe the relationship between the Americans for Reagan and NCCC, noting specifically:

(1) the date on which Americans for Reagan was organized or formed;

(2) whether Americans for Reagan maintains bank accounts or an accounting of receipts and expenditures separate and apart from NCCC;

(3) whether Americans for Reagan employs a staff separate and apart from that of NCCC;

(4) whether solicitations or requests for contributions to Americans for Reagan request that checks be made payable to NCCC or to Americans for Reagan or to either NCCC or Americans for Reagan;

(5) whether monies received from checks received by NCCC which were made payable to NCCC have been used by Americans for Reagan,

(6) and in whose name the account is held into which funds contributed to or received for Americans for Reagan are deposited.

B. Please identify who participated in any way, directly or indirectly, in the planning, organization, and formation of Americans for Reagan, noting, where applicable, the position held with NCCC by each person so identified.

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WHEREFORE, the Vice Chairman of the Federal Election Commisison has set his hand at the offices of the Commission at 1325 K Street, N.W., Washington, D.C. this 15th day of October, 1980.

John W. McGarry
Vice Chairman

ATTEST:

Marjorie W. Emmons
Secretary to the Commission

8304042065 2

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
North Carolina Congressional)
Club ("NCCC"))

MUR 1299

CERTIFICATION

I, Marjorie W. Emmons, Recording Secretary for the Federal Election Commission's Executive Session on October 15, 1980, do hereby certify that the Commission decided by a vote of 5-0 to deny the North Carolina Congressional Club's request for an extension of time in which to respond to the complaint in MUR 1299.

Commissioners Aikens, Friedersdorf, Harris, McGarry, and Tiernan voted affirmatively for the decision. Commissioner Reiche abstained on the vote.

Attest:

10/15/80
Date

Marjorie W. Emmons
Secretary to the Commission

2304042063

October 7, 1980

MEMORANDUM TO: Marjorie W. Emmons

FROM: Elissa T. Garr

SUBJECT: MUR 1299

Please have the attached Memo distributed to the Commission on an expedited basis. Thankyyou.

8304042065

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY
80 OCT 7 P4: 35

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 7, 1980

MEMORANDUM

TO: The Commission

FROM: Charles N. Steele
General Counsel

SUBJECT: Request for Extension of Time in MUR 1299

Attached is a letter from counsel for the North Carolina Congressional Club ("NCCC") requesting an extension until October 24, 1980 in which to submit NCCC's response to the complaint in MUR 1299. Pursuant to the Commission's recently adopted expedited compliance procedures, the Office of General Counsel recommends this request for an extension be denied.

RECOMMENDATION

1. Deny NCCC's request for an extension of time in which to respond to the complaint in MUR 1299.

2. Send the attached letter.

Attachments

Letter from John Bolton - I
Letter to Mr. Bolton - II

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Gentner 410420

RECEIVED
GCC#2872
80 OCT 6 A9:51

COVINGTON & BURLING
888 SIXTEENTH STREET, N. W.
WASHINGTON, D. C. 20006

TELEPHONE
(202) 452-6000

WRITER'S DIRECT DIAL NUMBER
(202) 452-6418

TWX: 710-822-0005
TELEX: 89-593
CABLE: COVLING

October 3, 1980

Marsha Gentner, Esq.
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Dear Ms. Gentner:

As we discussed during our telephone conversations today, this letter is to inform you that I will be representing the Congressional Club in MUR 1299 as well as MUR 1252.

Vice Chairman McGarry's letter to me, dated September 25, 1980, stated that the Commission had "determined that there is reason to believe that NCCC has violated 2 U.S.C. § 432(e)(4)." The letter stated further that we could "submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter."

I do plan to make a further submission on the Section 432(e)(4) issue. However, as I explained today, I have been in trial before the United States District Court for the Western District of Oklahoma since September 8. I expect that that trial will continue for some substantial additional amount of time. I cannot at this point even predict when it will conclude, since opposing counsel have yet to begin their case in chief.

You indicated that a further submission could wait until October 24. I will make every effort to prepare a filing by that date, but, because of my trial schedule, I may need to request an extension of time. I want you to be aware of my schedule now so that we can minimize possible problems.

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Attachment I

For the same reason, I would like to request an extension of time until October 24 to respond to the Complaint in MUR 1299 (which I have not yet received).

Sincerely yours,

John R. Bolton

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

John R. Bolton, Esquire
Covington and Burling
888 16th Street, N.W.
Washington, D.C. 20006

RE: MUR 1299

Dear Mr. Bolton:

This Office has received your letter of October 3, 1980 requesting an extension of time until October 24, 1980 in which to submit NCCC's response to the complaint filed in the above referenced action. On October , 1980, the Commission voted to deny your request for an extension. As you are probably aware, the Commission is under a statutory duty to conduct its investigations expeditiously, and therefore feels it cannot sanction any delay in the processing or consideration of this matter. If you have any questions about this or any other Commission action, please call Marsha Gentner at 523-5071.

Sincerely,

Charles N. Steele
General Counsel

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Attachment II

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RECEIVED
GCC#2872
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COVINGTON & BURLING
888 SIXTEENTH STREET, N. W.
WASHINGTON, D. C. 20006

TELEPHONE
(202) 452-6000

WRITER'S DIRECT DIAL NUMBER
(202) 452-6418

TWX: 710-822-0005
TELEX: 89-593
CABLE: COVLING

October 3, 1980

80 OCT 6 A11:47

Marsha Gentner, Esq.
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Dear Ms. Gentner:

As we discussed during our telephone conversations today, this letter is to inform you that I will be representing the Congressional Club in MUR 1299 as well as MUR 1252.

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Sincerely yours,

John R. Bolton

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COVINGTON & BURLING
888 SIXTEENTH STREET, N. W.
WASHINGTON, D. C. 20006

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WASH'NGTON
D.C.

Marsha Gentner, Esq.
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

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COVINGTON & BURLING
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WASHINGTON, D.C. 20006

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October 3, 1980

80 OCT 6 A11:47

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Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Dear Ms. Gentner:

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Vice Chairman McGarry's letter to me, dated September 25, 1980, stated that the Commission had "determined that there is reason to believe that NCCC has violated 2 U.S.C. § 432(e)(4)." The letter stated further that we could "submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter."

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Sincerely yours,

John R. Bolton

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

September 25, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

John R. Bolton, Esquire
Covington and Burling
888 Sixteenth Street, N.W.
Washington, D.C. 20006

Re: MUR 1252

Dear Mr. Bolton.

On July 7, 1980, the Federal Election Commission notified your client, the North Carolina Congressional Club ("NCCC"), of a complaint that NCCC has violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act") and Chapter 95 of Title 26, U.S. Code. A copy of the complaint was forwarded to NCCC at that time.

Upon further review of the allegations contained in the complaint and of information which you have supplied in response, the Commission has determined that there is reason to believe that NCCC has violated 2 U.S.C. § 432(e)(4). The Commission did not, however, find reason to believe that NCCC violated 2 U.S.C. § 441a(a) and 26 U.S.C. § 9012(f) by making excessive in-kind contributions and expenditures on behalf of Ronald Reagan. A report on the Commission's finding is attached. You may submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter.

We acknowledge receipt of your response to this matter which was dated July 30, 1980. In the absence of any additional information or further explanation of circumstances which demonstrate that no further action should be taken against NCCC, the Commission may find probable cause to believe that a violation of 2 U.S.C. § 432(e)(4) has occurred, and proceed with formal conciliation. Of course, this does not preclude the settlement of this matter through informal conciliation prior to a finding of probable cause to believe if you so desire.

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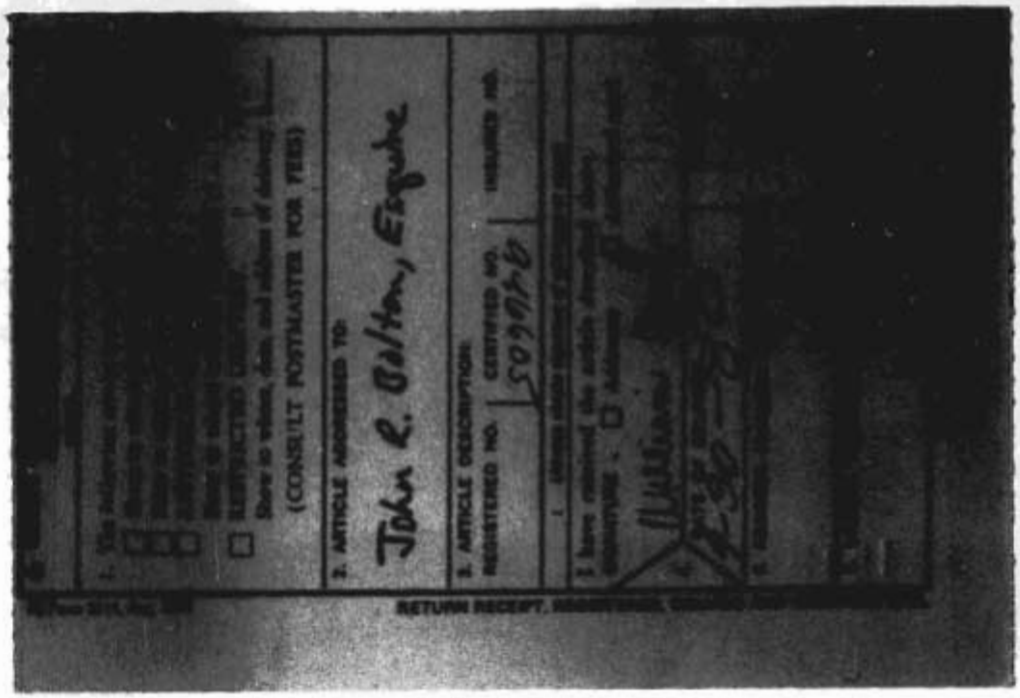
This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public. If you have any questions, please contact Marsha G. Gentner or Anne A. Weissenborn, the attorneys assigned to this matter, at 523-5071.

Sincerely,

JOHN WARREN McGARRY
Vice-Chairman

Enclosure



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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

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Covington and Burling
888 Sixteenth Street, N.W.
Washington, D.C. 20006

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AGW 9/25/80

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This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public. If you have any questions, please contact Marsha G. Gentner or Anne A. Weissenborn, the attorneys assigned to this matter, at 523-5071.

Sincerely,

Enclosure

8304042065 57

FEDERAL ELECTION COMMISSION

NOTIFICATION OF REASON TO BELIEVE FINDING

DATE SEP 25 1980

MUR NO. 1252

STAFF MEMBER (S) & TEL. NO.

RESPONDENT The North Carolina Congressional Club

Marsha Gentner

Anne A. Weissenborn

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

BACKGROUND

On July 2, 1980, the Carter-Mondale Reelection Committee, Inc., and the Democratic National Committee (hereinafter "Complainants") submitted a complaint which contained the following allegation:

> That the North Carolina Congressional Club (hereinafter "NCCC"), has violated 2 U.S.C. § 432(e)(4) in that its project "Americans for Reagan" is a discrete, unauthorized political committee which has included "Reagan" in its name.

2 U.S.C. § 432(e)(4) provides that unauthorized committees may not include the name of any candidate in their names. Complainants alleged in their initial complaint that "Americans for Reagan", a project of NCCC, is a discrete, unauthorized political committee which has the name "Reagan" in its name in violation of 2 U.S.C. § 432(e)(4).

As part of their July 21, 1980, supplement to their complaint, complainants provide copies of solicitation materials used for Americans for Reagan. This solicitation contains fine print at the bottom of the first page identifying it as a "project " of NCCC.

The Office of General Counsel has recommended that the Commission find reason to believe that NCCC has violated 2 U.S.C. § 432(e)(4).

COMMISSION DETERMINATION

Based on the above analysis, the Federal Election Commission has found reason to believe that the North Carolina Congessional Club has violated 2 U.S.C. § 432(e)(4).

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COVINGTON & BURLING
888 SIXTEENTH STREET, N. W.
WASHINGTON, D. C. 20006

TELEPHONE
(202) 452-6000
WRITER'S DIRECT DIAL NUMBER
(202) 452-6418

TWX: 710-822-0006
TELEX: 89-593
CABLE: COVLING

July 30, 1980

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RECEIVED
GENERAL COUNSEL
FEC

Charles N. Steele, Esq.
General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: MUR 1252

Dear Mr. Steele:

This letter and its attachments are in response to your letter to the Honorary Chairman of the Congressional Club, dated July 7, 1980, and pursuant to the procedures outlined in 11 C.F.R. § 111.6. We demonstrate herein that the Federal Election Commission (the "Commission") should take no action against the Congressional Club on the basis of the complaint filed with the Commission by the Carter-Mondale Reelection Committee, Inc., and the Democratic National Committee ("Carter-Mondale/DNC"). We believe that the complaint against the Congressional Club should be dismissed forthwith.

This demonstration is divided into three parts. In Part I, we raise certain very serious threshold objections to the Commission taking any action on the basis of the complaint. In Part II, we demonstrate that, as a matter of fact, the allegations made by Carter-Mondale/DNC are frivolous and

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irrelevant. In Part III, we demonstrate that the complaint has no legal basis.

PART I - THRESHOLD OBJECTIONS

1. Based on the information available, it appears that the Carter-Mondale/DNC complaint is a politically motivated attempt to chill protected First Amendment activity on the part of the Congressional Club. We realize that the Commission has no control over the filing of such complaints. We believe also, however, that if the Commission does not guard against the misuse of its enforcement procedures, very serious due process questions arise. This Commission is not a forum for partisan struggles which should properly be fought in the political arena. It should not permit its enforcement process to be used by one group of political partisans to harass their opponents.

The Congressional Club has already found that potential contributors are being deterred from contributing by the pendency of this Matter Under Review ("MUR"), and it faces the very real prospect of substantial further harm until this matter is resolved. This prospect is particularly aggravated because of the publicity on this matter being continuously generated by Carter-Mondale/DNC. Recently, for instance, Carter-Mondale/DNC have written to radio and television stations around the country advising these stations of the pendency of

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this MUR, and "suggesting" that no time be sold to any of the respondents. The Commission should, in the first instance, before any examination of the "facts" alleged by Carter-Mondale/DNC, dismiss this complaint as nothing more than a political charade.

2. Since the complaint in this matter was filed, Carter-Mondale/DNC have generated a substantial amount of publicity concerning it. Moreover, the numerous amendments and supplements to the complaint have provided further opportunities for regular press conferences by Carter-Mondale/DNC. Within the past week, it has been reported that the General Counsel of the Carter-Mondale Reelection Committee, Inc., who is listed as "of counsel" on the complaint, said that:

> "... Carter forces are supplying the FEC almost daily with examples of contact between the [independent] groups and the Reagan campaign."

Washington Post, July 24, 1980, p. A5, col. 5. The very next day, anonymous sources within the Carter campaign were cited as the source for a deceptive quotation of remarks made by Senator Helms. Washington Post, July 25, 1980, p. A3, col. 5.

These examples would appear, on their face, to violate the confidentiality provisions of the Federal Election Campaign Act, as amended ("FECA"), 2 U.S.C. § 437g(a)(12), and the Commission's own Regulations, 11 C.F.R. § 111.21. Carter-Mondale/DNC's actions demonstrate further the political nature of this complaint. They provide an independent basis for immediate dismissal.

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3. Since the filing of the original complaint, Carter-Mondale/DNC have apparently filed one amendment and at least four supplements. Although the original complaint was transmitted to the Congressional Club in a letter from the General Counsel, dated July 7, 1980, none of the subsequent amendments or supplements have been so transmitted. Nonetheless, because counsel for Carter-Mondale/DNC has transmitted them to us directly, we are aware that these amendments and supplements are before the Commission (or at least the General Counsel's staff).

The Commission's regulations do not provide for amendments and supplements to complaints. We believe that the Commission should establish a procedure to prevent the continuing filing of these amendments and supplements so that this MUR can be dismissed promptly and in an orderly fashion. If some steps in that direction are not taken, the Congressional Club will remain in the unfair position of having to respond to a stream of unfounded and confusive amendments and supplements throughout the Commission's deliberations over this MUR. This flow of paper from Carter-Mondale/DNC is disrupting the procedures mandated by the FECA Amendments of 1979, and, in effect, reducing the fifteen-day period provided as the statutory minimum amount of time for a respondent to demonstrate that no action should be taken against it. Until the Commission has formally notified the Congressional Club of the

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filing of these amendments and supplements, we believe they should be treated as of no force and effect. We note also that more than five days has passed since the amendment of July 8, and the supplements of July 14, July 16, July 21 and July 22 (all of which were apparently delivered to the Commission by hand on those dates). Accordingly, with one exception, we intend to disregard these filings.*/ Any action taken by the Commission on the basis, in whole or in part, of these amendments and supplements would, we believe, constitute a violation of the FECA, this Commission's Regulations, and the due process guarantees of the Fifth Amendment.**/

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PART II -- "FACTUAL" ALLEGATIONS

We demonstrate in this section that, taken singly or in any combination, none of the "facts" alleged by Carter-Mondale/DNC provide any basis whatever for the Commission to conclude that the Congressional Club's activities are in any

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*/ The one exception is the distorted quotation of Senator Helms referred to above. Since this quotation has already appeared in Washington newspapers and may well have been read by the Commissioners or staff, we feel that we have no recourse but to refute it. We note, however, that this quotation was made available to the press by Carter-Mondale/DNC, demonstrating yet again the political nature of this MUR and the risks posed by it to the integrity of the Commission's enforcement procedures.

**/ There have also been a number of letters exchanged between counsel for Carter-Mondale/DNC and the Commission's General Counsel. We believe it highly inappropriate and improper for counsel for Carter-Mondale/DNC to submit these letters, and equally inappropriate and improper for the Commission to respond.

way tied to the official Reagan campaign. To the contrary, the Congressional Club is wholly independent. See 11 C.F.R. § 109.1.

Carter-Mondale/DNC have simply presented a collage of news clippings and historical information, often incorrect, usually misleading, and uniformly irrelevant. The following is a point-by-point treatment and refutation of their allegations, following the order in the complaint (with references to the pertinent pages of the complaint):

Page 6: The paragraph describing the Congressional Club purports to provide certain information derived from reports on file with the Commission. This information is entirely irrelevant, and in some instances mistaken. Not the least of the errors is that Carter-Mondale/DNC has incorrectly listed the Congressional Club's address.

Page 15: Carter-Mondale/DNC refers to a Boston Globe article mentioning the Congressional Club. The Congressional Club's expenditures have been fully and accurately reported in its filings with the Commission, and are irrelevant here.

Page 16: Carter-Mondale/DNC refers to several newspaper articles. These references, whether or not true, are wholly irrelevant.

Pages 30-32: Carter-Mondale/DNC is incorrect when it states that "Mr. Helms is the prime organizer of NCCC and it is the beneficiary of substantial funds left over from

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Senator Helms personal campaigns." The Congressional Club was initially organized by Thomas F. Ellis and like-minded colleagues. Senator Helms has never held any office other than "honorary chairman," and he has no decision-making responsibility for the Congressional Club. After the 1972 election, Senator Helms' campaign had a considerable debt. When the 1978 Helms for Senate Committee was terminated, only a very small amount was transferred from that committee to the Congressional Club (which were then affiliated). All of the foregoing is, in any case, irrelevant. The only discernible purpose of these allegations is rhetorical.

(a)*/ In a fashion typical of the errors in this complaint, it states that Senator Helms has been a Senator since 1972. Senator Helms was first elected in 1972. His term began in January, 1973. These facts are irrelevant.

(b) The Committee on Conservative Alternatives, referred to in the complaint, was not established "to explore the possibility of a third-party Reagan-for-President bid." It was established to consider whether conservatives should work within the Republican or Democratic parties, or form a third party. Whatever it did is completely irrelevant here.

(c) Politicians differ on the causes of Governor Reagan's victory in the 1976 North Carolina primary. Whatever Senator Helms' role was, it is irrelevant here. Senator Helms

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*/ For the next several items, we follow the outline of the complaint.

was not a delegate to the 1976 Republican National Convention, and he was not involved in deciding Convention strategy for Governor Reagan.

(d) The only conceivable purpose of this allegation is to attempt to prejudice the Commission against the Congressional Club because of the policy positions taken by Senator Helms. Any indication that Senator Helms' views on this Commission or any other subject play any role in the Commission's resolution of this matter would have the gravest consequences.

(e) Governor Reagan did not campaign for Senator Helms in North Carolina in 1976; lawful contributions were made to the Helms for Senate Committee by Citizens for the Republic ("CFTR"). All of this is irrelevant.

(f) We have no idea what an "official endorsement" is. Whatever Carter-Mondale/DNC believes it to mean, it is irrelevant.

(g) This allegation is irrelevant.

(h) Charles Black served on Senator Helms' Senate staff until 1975. Mr. Black has no relationship with the Congressional Club. The remainder of this allegation, and accompanying footnote, do not deal with the Congressional Club (except for Mr. Finkelstein, discussed infra). The allegations are, in any event, irrelevant.

(i) North Carolina law provides that, until George Bush released his delegates, the delegation was required to cast thirty votes for Governor Reagan's nomination, and ten

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votes for Ambassador Bush's nomination for President. The allegation is irrelevant.

Page 32: The complaint makes several incorrect statements concerning Bruce W. Eberle. First, Mr. Eberle is not an "organizer" of the Congressional Club's independent-expenditure project; he is merely one of the Congressional Club's vendors. He has done no work for the Reagan campaign in 1980. The allegation is irrelevant.

Page 33: Thomas Ellis was treasurer of the 1976 Reagan campaign in North Carolina. Mr. Ellis' communication (singular, not plural, as the complaint incorrectly states) with the American Conservative Union in 1976 is irrelevant. So is the rest of this allegation.

Page 33: These allegations are correct. They are also irrelevant.

Pages 33-34: Carter-Mondale/DNC purports to describe "conversations among respondents" concerning the Reagan campaign. No such conversations concerning the Congressional Club are enumerated. None have occurred. These allegations are nothing but speculation, they are irrelevant, and they should be disregarded.*/

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*/ The only "authority" cited is an affidavit by Robert S. Strauss. Mr. Strauss' affidavit reads like a political press release. It should be treated accordingly.

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Appendix: Although the Appendix to the complaint lists a number of so-called "common vendors," it is completely unclear from the complaint what purpose the list serves. Nonetheless, we demonstrate that these "common vendors" are not common at all.

(1) Arthur J. Finkelstein & Associates has provided services to the Congressional Club. Neither Mr. Finkelstein, nor his firm have provided the Congressional Club with any information concerning the Reagan campaign's plans, projects or needs. Moreover, Mr. Finkelstein's firm advised the Congressional Club that the services of Mr. Finkelstein's firm were terminated by the Reagan campaign in or about February, 1980. The Congressional Club has no knowledge what services Mr. Finkelstein's firm provides to the other committees mentioned.

(2) Ruth Jones, Ltd., was retained by the Helms for Senate Committee in 1978. That firm has done no work for the Congressional Club, and it has done nothing whatever in connection with the Congressional Club's independent-expenditure campaign.

(3) Bruce Eberle Associates, Inc., has been a vendor of direct-mail services to the Congressional Club beginning in early 1980. He is not "active" in the Club's affairs, as the complaint alleges; as noted above, he is merely a vendor. The Congressional Club has no knowledge what work Mr. Eberle or his firm have done for the Fund for a Conservative Majority ("FCM") or CFTR.

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(4) Input Data Associates is a firm which does computer keypunching through use of an optical scanning device. They provide no "political services," and, in any event, they have not been utilized by the Congressional Club in its independent-expenditure campaign. Until the filing of the Carter-Mondale/DNC complaint, the Congressional Club did not even know that CFTR and the National Conservative Political Action Committee ("NCPAC") utilized the services of Input Data Associates.

(5) Communications Corporation of America has a laser printer which the Congressional Club used only once, in May, 1979. Until the filing of this complaint, the Congressional Club did not know that FCM had ever used the services of Communications Corporation of America.

Supplemental Complaint of July 22: In perhaps the most disingenuous of their allegations, Carter-Mondale/DNC quote out of context certain remarks made during a television news interview by Senator Helms. We quote below pertinent passages of that interview which supply the requisite context:

"Mr. Vanocur: You probably know that former President Ford suggested an open door policy, there might be conditions. Do you think nominee Reagan can grant those conditions?

"Senator Helms: Well, it depends on what they are. I can't believe that Jerry Ford would ask Ron Reagan to give up the family jewels,

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you know. But I believe they could come to a meeting of the minds about responsibilities, and if Ford is saying, for example, President Reagan, I want to be able to have access to you and discuss foreign policy matters, economic matters, and so forth, I think Reagan would readily say okay.

"Mr. Vanocur: But all Presidents promise - you know John Nance Garner said it wasn't worth a pitcher of warm spit. Has it ever conceived to you -- does it seem possible to you that will ever change?

"Senator Helms: I think Garner was wrong about that. That potential of the office of Vice-President as President of the Senate, which the Vice-President is under the Constitution, if he pursues what his responsibility is, it's a tremendously important job potentially. Now, I wish the public would disabuse its mind of this feeling that the Vice-President is not important. It is unimportant as long as the Vice-President is a political surrogate, goes around cutting ribbons and that sort of thing, but if he would sit there in the Senate and preside over the Senate and make some of the decisions which are now made by the majority leader alone, it could have a tremendous influence.

"Mr. Vanocur: Have you discussed any of this with Governor Reagan? What was your last meeting? What did you discuss?

"Senator Helms: Well, as you may know, we've an independent effort going on in

North Carolina. The law forbids me to consult with him. And it's been an awkward situation. I've had sort of talk indirectly with Paul Laxalt and hope that he would pass along - and I think the messages have gotten through all right but --

"Mr. Vanocur: What were they?

"Senator Helms: Well, you know, about the importance of the Vice-Presidency such as you mentioned. But I've got to say to you that I've had no contact with him because it would be violative of the law if I had.

"Mr. Vanocur: Thank you very much."

It is apparent that Senator Helms was discussing the constitutional role of the Vice President, not election campaigning. Carter-Mondale/DNC omitted any mention of the context of the interview or Senator Helms' answer to the question "[w]hat were they?" Senator Helms' affidavit make clear that there has been no contact with the Reagan campaign that would compromise his or the Congressional Club's independence.

PART III -- LEGAL ANALYSIS

Although the complaint lists several purported violations of the FECA, none have any merit whatever. The Commission's Regulations prescribe the standards for independent expenditures. These expenditures are defined as expenditures advocating the election of a clearly identified candidate "which [are] not made with the cooperation or with the

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prior consent of, or in consultation with, or at the request or suggestion of, a candidate or any agent or authorized committee of such candidate." 11 C.F.R. § 109.1(a). This last-quoted phrase is further defined by the Regulations to mean "[a]ny arrangement, coordination, or direction by the candidate or his or her agent prior to the publication, distribution, display or broadcast of the communication." Id. at § 109.1(a)(4)(i).

As the affidavits accompanying this letter demonstrate, there has been no "arrangement, coordination or direction by the candidate or his... agent" here. The complaint itself is utterly devoid of any such allegations. Accordingly, there is no violation, and this MUR should be dismissed.

The complaint also alleges a violation of 2 U.S.C. § 432(e)(4), in that the Congressional Club's project, Americans for Reagan, is a "discrete, unauthorized political committee[]." This allegation concedes that Americans for Reagan must itself be a political committee, within the meaning of the FECA, before any violation can arise. Americans for Reagan is not such a political committee. It is simply one of many projects undertaken by the Congressional Club. There is no statutory prohibition whatever against such a name. The Congressional Club is no more forbidden from giving a name to one of its projects than it is from using Governor Reagan's name in its communications.

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Any suggestion to the contrary finds no support in the FECA. The statutory drafters knew how to include within the scope of Section 434(e)(4) what they chose. They chose to preclude unauthorized "political committees" from using a candidate's name as a part of their own names. If they had wanted to include projects, they could have done so. They did not. Any attempt to construe the statute to encompass the present situation would render the statute unconstitutionally vague and therefore violative of the First and Fifth Amendments.

Finally, the complaint alleges a violation of 26 U.S.C. § 9012(f). This issue is now in litigation in the United States District Court for the District of Columbia, and we comment only briefly on it here. Section 9012(f) does not apply to independent expenditures, as this Commission decided in 1976.*/ In 1976, the Commission proposed "Optional Part 146" to its Regulations. Hearings were held, and extensive testimony was heard concerning whether Section 9012(f) restricted independent expenditures. As finally issued, Part 146 of the Regulations made no attempt to regulate independent spending in general-election presidential campaigns.

The Commission's own recently announced new Regulations make no mention that Section 9012(f) limits independent

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*/ We concur with the statutory-construction argument made by counsel for American for Change, et al. in their Motion To Dismiss, recently filed in Common Cause, et al. v. Schmitt, et al., Civil Action No. 80-1609 (D.D.C.)

expenditures. See CCH Fed. Elec. Camp. Fin. Guide ¶ 9125. (These new Regulations delete Part 146 because of changes made by the FECA Amendments of 1979.) The "Summary" of the new Regulations states that "[t]he regulations have been renumbered according to the section of Title 26 of the U.S. Code upon which each is based . . . ." No regulations are proposed under Section 9012(f) that purport to limit independent expenditures.

To the contrary, the new Regulations at least implicitly sanction independent expenditures in general-election presidential campaigns. The definition of "political committee" in the new Regulations states that "...for the purpose of 26 U.S.C. § 9012(f), the term 'political committee' shall be defined in accordance with 11 CFR 100.5." 11 C.F.R. § 9002.9. The definition of "political committee" in Section 100.5 includes "unauthorized committees," 11 C.F.R. § 100.5(f)(2). These are precisely the committees entitled to make independent expenditures. Id. at § 100.16. The only reasonable reading of these interlocking definitions is that the Commission did not consider Section 9012(f) to bar independent expenditures of the kind at issue here.*/

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*/ As recently as March 12, 1980, the Commission also implicitly agreed that independent expenditures on behalf of general-election presidential candidates were permissible. Advisory Opinion 1979-80 (response to "Situation One").

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The Commission has, on several occasions, after hearings and comments, considered the matter and concluded that Section 9012(f) did not restrain independent expenditures. We believe that the Commission should reconsider its recent decision to the contrary, and construe Section 9012(f) not to apply to independent spending, as it had been doing for the last four years. The most serious due process questions would arise if the Commission does not reconsider. Moreover, if applied to independent expenditures, Section 9012(f) would plainly violate the First Amendment.

CONCLUSION

The foregoing discussion demonstrates that, both as a matter of fact and as a matter of law, the complaint is completely meritless. It should be promptly dismissed.

Sincerely yours,

John R. Bolton

Enclosures

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STATE OF NORTH CAROLINA)
) ss.
COUNTY OF WAKE)

AFFIDAVIT OF CARTER WRENN

1. I am the Executive Director and Treasurer of the Congressional Club. In those capacities, I am responsible for the day-to-day operations of the Club and for the duties imposed on Treasurers of political committees by the Federal Election Campaign Act, as amended ("FECA").

2. During the first part of 1980, Thomas F. Ellis, (Chairman of the Congressional Club) and I decided that the Congressional Club would make independent expenditures on behalf of Governor Reagan's presidential campaign, in both the primary- and general-election periods. Senator Helms, the Congressional Club's Honorary Chairman, was advised of this decision, but he did not participate in making it. Mr. Ellis and I have made all decisions concerning the form and manner in which the Congressional Club would make its independent expenditures.

3. Although I am not a lawyer, I am familiar (as a layman) with the FECA's provisions concerning independent expenditures, and I am also familiar with the pertinent Regulations of the Federal Election Commission. Mr. Ellis and I were determined that the Congressional Club's expenditures be completely independent of the Reagan campaign. Accordingly, we consulted with counsel before undertaking our project, and

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we have continued to seek legal advice where appropriate. We have taken every precaution to preserve our independence, and I believe we have been entirely successful.

4. I can state unequivocally that none of the Congressional Club's independent expenditures have been made with the cooperation or with the prior consent of, or at the request or suggestion of, Governor Reagan or any agent or any authorized committee of his. There has not been any arrangement, coordination, or direction by Governor Reagan or any of his agents prior to any of our independent expenditures.

5. I can also state unequivocally that none of the Congressional Club's independent expenditures have been based on information about Governor Reagan's plans, projects or needs provided to us by Governor Reagan or any of his agents. Moreover, to my knowledge, none of the Congressional Club's independent expenditures have been made by or through any person who is, or has been, authorized by Governor Reagan to raise or expend funds on his behalf; or through anyone who is, or has been, an officer of an authorized Reagan committee; or through anyone who is, or has been, receiving any form of compensation or reimbursement from Governor Reagan, his agents, or his authorized committees.

6. The Congressional Club has already found that potential contributors are being deterred from contributing by the pendency of the complaint. We face the very real prospect of further harm until this matter is resolved.

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7. Certain statements made in the complaint filed by the Carter-Mondale Reelection Committee, Inc., and the Democratic National Committee against the Congressional Club are inaccurate, misleading, or both. I deal in the following paragraphs which those items which are not matters of public record or otherwise obvious:

a. The Congressional Club was initially organized by Mr. Ellis and like-minded colleagues. Senator Helms was not the prime organizer or even one of the organizers. Senator Helms has never held any office with the Congressional Club expect that of "Honorary Chairman." Senator Helms has no decision-making responsibility for the activities of the Congressional Club.

b. The Committee on Conservative Alternatives was not established "to explore the possibility of a third-party Reagan-for-President bid." It was established to allow conservatives to decide whether their future would be best spent in the Republican Party, the Democratic party, or in a third party.

c. Charles Black served on Senator Helms' Senate staff until 1975. Mr. Black has no relationship with the Congreslsional Club.

d. Bruce W. Eberle is not, as the complaint alleges, an "organizer" of the Congressional Club's independent-expenditure project. He is merely one of the Congressional Club's vendors. To my knowledge, he has done no work for the Reagan campaign in 1980.

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e. Mr. Ellis was Treasurer of the 1976 Reagan campaign in North Carolina.

f. Neither I, nor anyone else in any way connected with the Congressional Club to my knowledge has had any conversations with any other respondents concerning the Reagan campaign or the Congressional Club's independent-expenditure campaign.

g. At my direction, a transcription was made of Senator Helms' interview with Sander Vanoker on July 16, 1980. That transcript demonstrates that Senator Helms spoke to Senator Laxalt only about the role of the Vice-President as President of the Senate, and not about the Reagan campaign or the Congressional Club's independent-expenditure project.

h. As to the so-called "common vendors," I can state as follows:

(1) Arthur J. Finkelstein & Associates has provided services to the Congressional Club. Neither Mr. Finkelstein nor his firm have provided the Congressional Club with any information concerning the official Reagan campaign's plans, projects or needs. Moreover, Mr. Finkelstein's firm advised me that the services of his firm were terminated by the Reagan campaign in or about February, 1980. I have no knowledge what services Mr. Finkelstein's firm provides to the other committees mentioned.

(2) Ruth Jones, Ltd., was retained by the Helms for Senate Committee in 1978. That firm has done

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no work for the Congressional Club, and it has done nothing whatever in connection with the Congressional Club's independent-expenditure campaign.

(3) Bruce Eberle Associates, Inc., has been a vendor of direct-mail services to the Congressional Club beginning in early 1980. He is not "active" in the Club's affairs, as the complaint alleges; as noted above, he is merely a vendor. I have no knowledge what work Mr. Eberle or his firm have done for the Fund for a Conservative Majority ("FCM") or Citizens for the Republic ("CFTR").

(4) Input Data Associates is a firm which does computer keypunching through use of an optical scanning device. It provides no "political services," and, in any event, they have not been utilized by the Congressional Club in its independent-expenditure campaign. Until the filing of the Carter-Mondale/ DNC complaint, I did not even know that CFTR and the National Conservative Political Action Committee utilized the services of Input Data Associates.

(5) Communications Corporation of America has a laser printer which the Congressional Club used only once, in May, 1979. Until the filing of this complaint,

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I did not know that FCM had ever used the services of Communications Corporation of America.

Carter Wrenn
CARTER WRENN

SUBSCRIBED AND SWORN TO before me this 30th day of July, 1980.

Dorothy D. Acton
Notary Public

My Commission Expires August 27, 1980

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CITY OF WASHINGTON)
) ss.
DISTRICT OF COLUMBIA)

AFFIDAVIT OF JESSE HELMS

1. I am a United States Senator from the State of North Carolina. I was first elected in 1972, and I was sworn in as a Senator in January, 1973. I was reelected to the Senate in 1978.

2. I am the Honorary Chairman of the Congressional Club, and I have never held any other office in that organization. The Congressional Club was first organized by Thomas F. Ellis and like-minded colleagues. I have no decision-making responsibility for the Congressional Club's activities.

3. I was informed during the first part of this year that Messrs. Ellis and Wrenn had decided that the Congressional Club would undertake an independent-expenditure campaign on behalf of Governor Reagan. I had no role in making that decision.

4. I can state unequivocally that I have done nothing with the cooperation or with the prior consent of, or at the request or suggestion of, Governor Reagan or any agent or any authorized committee of his. There has not been any arrangement, coordination, or direction by Governor Reagan or any of his agents prior to any of my activities.

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5. I can also state unequivocally that none of my activities have been based on information about Governor Reagan's plans, projects or needs provided to us by Governor Reagan or any of his agents. Moreover, none of my activities have been conducted by or through any person who is, or has been, authorized by Governor Reagan to raise or expend funds on his behalf; or through anyone who is, or has been, an officer of an authorized Reagan committee; or through anyone who is, or has been, receiving any form of compensation or reimbursement from Governor Reagan, his agents, or his authorized committees.

6. I am aware that a supplement to the complaint filed by the Carter-Mondale Reelection Committee, Inc., and the Democratic National Committee against the Congressional Club quotes from a television interview during the Republican National Convention. The reference in that quotation to my conversation with Senator Laxalt is highly misleading. I spoke with Senator Laxalt only about the constitutional role of the Vice President as President of the Senate. As a Senator, I have been concerned about that role for some time, feeling that the Presidency of the Senate should be an important post within the Federal government. I did not at any time discuss with Senator Laxalt or anyone else within the Reagan campaign any aspects of his campaign or the independent-expenditure project of the Congressional Club.

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7. I was not a delegate to the 1976 Republican National Convention, and I was not involved in deciding Convention strategy for Governor Reagan.

Jesse Helms
JESSE HELMS

SUBSCRIBED AND SWORN TO before me this 29th day of July, 1980.

Donna E. Wood
Notary Public
My Commission Expires: 1-1-82

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COVINGTON & BURLING
888 SIXTEENTH STREET, N.W.
WASHINGTON, D.C. 20006

HAND DELIVER

Charles N. Steele, Esq.
General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

COVINGTON & BURLING
888 SIXTEENTH STREET, N.W.
WASHINGTON, D. C. 20006

HAND DELIVER

Marsha Gentner, Esq.
Office of General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

MUR 1252

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Senator Jesse Helms
Honorary Chairman

The Congressional Club

EXECUTIVE COMMITTEE
Thomas F. Ellis
Chairman
Carter Wrenn
Treasurer
Hugh Chatham
Ed Morris
Marion Parrott
W. T. Joyner, Jr.

July 18, 1980

Ms. Marsha Gentner
Federal Election Commission
Washington, D.C. 20463

Re: MUR 153

Dear Ms. Gentner:

As requested in Mr. Steele's letter of July 7,1980, this will advise you that we do intend to be represented by counsel. Our attorney is:

Mr. John Bolton
Attorney at Law
Covington & Burling
888 16th Street, N.W.
Washington, D.C. 20006
(202) 452-6000

Mr. Bolton should receive any notifications and other communications from the Commission.

Sincerely,

Carter Wrenn

CW:am

30 JUL 25 AM 8:36

The Congressional Club • P.O. Box 18848 • 3825 Barret Drive • Raleigh, North Carolina 27609

Not Printed or Mailed at Government Expense
The foregoing material together with all attachments and enclosures is authorized and paid for by The Congressional Club, Thomas F. Ellis, Chairman, Carter Wrenn, Treasurer. A copy of our report is filed with the FEC and is available for purchase from the FEC, Washington, D.C.

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The Congressional Club
P.O. Box 18848
3825 Barret Drive
Raleigh, North Carolina 27619

RALEIGH N.C. JUL 21 '80 667305 U.S. POSTAGE 15¢

Ms. Marsha Gentner
Federal Election Commission
Washington, D.C. 20463

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 9, 1980

FEDERAL EXPRESS

The Honorable Jesse Helms
Honorary Chairman
North Carolina Congressional Club
P.O. Box 18838
3825 Barret Drive
Raleigh, North Carolina 27609

Dear Senator Helms:

Enclosed is a copy of the letter the Federal Election Commission today directed be sent to counsel for the Carter-Mondale Presidential Committee, Inc.

Sincerely,

Charles N. Steele
General Counsel

Enclosure

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 7, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

The Honorable Jesse Helms
Honorary Chairman
North Carolina Congressional Club
P.O. Box 18838
3825 Barret Drive
Raleigh, North Carolina 27609

Re: MUR 1252

Dear Senator Helms:

This letter is to notify you that on July 2, 1980, the Federal Election Commission received a complaint which alleges that your Committee may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act") and Chapter 95 of Title 26, U.S. Code. We have numbered this matter MUR 1252. Please refer to this number in all future correspondence.

A copy of the complaint is enclosed. We understand that complainant hand delivered a copy of the complaint including exhibits to you on July 2, 1980. Therefore, we have not enclosed a copy of these extensive exhibits to the complaint. However, if you would like another copy of the exhibits, we would, of course, provide it upon request.

Under the Act, you have the opportunity to demonstrate, in writing, that no action should be taken against your Committee in connection with this matter. Your response must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

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This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

If you intend to be represented by counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

If you have any questions, please contact Marsha Gentner, the attorney assigned to this matter, at (202) 523-4057. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

Enclosures

1. Complaint
2. Procedures

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 31, 1983

Robert R. Sparks, Jr., Esquire
Counsel, National Conservative Political
Action Committee
Sedam and Herge
8300 Greensboro Drive
McLean, Virginia 22102

RE: MUR 1252/1299

Dear Mr. Sparks:

On May 24, 1983, the Commission determined that it will take no further action with regard to the violation of 26 U.S.C. § 9012(f) and with regard to the alleged violation of 2 U.S.C. § 441a by the National Conservative Political Action Committee ("NCPAC"). The Commission has also determined that there is no probable cause to believe that your client violated 2 U.S.C. § 432(e)(4).

Accordingly, the file in this matter has been closed and will become part of the public record within thirty days. Should you wish to submit any factual or legal materials to appear on the public record, please do so within ten days.

If you have any questions, please contact Anne A. Weissenborn at (202) 523-4175.

Sincerely,

Charles N. Steele
General Counsel

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SEDAM & HERGE
A PROFESSIONAL CORPORATION
ATTORNEYS AT LAW
SUITE 1100
6300 GREENSBORO DRIVE
McLEAN, VIRGINIA 22101

(703) 821-1000

GLENN J. SEDAM, JR.
J. CURTIS HERGE
ROBERT R. SPARKS, JR.
A. MARK CHRISTOPHER

JANIS A. CHERRY
JOHN ROBERT CLARK III
B. ERIC SIVERTSEN
SHARON L. POWERS
CLAIRE M. BOCCELLA

SUITE 650
1700 PENNSYLVANIA AVENUE, N.W.
WASHINGTON, D.C. 20006
(703) 821-1000

TELEX 710-[illegible]

CABLE: SEDAMHERGE

April 18, 1983

Ms. Marjorie Emmons
Commission Secretary
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: MUR 1252/1299

Dear Ms. Emmons:

This letter is written on behalf of our client, National Conservative Political Action Committee ("NPCAC"), in response to the General Counsel's Brief to the Commission in this matter, dated March 25, 1983.

In that brief, the General Counsel has recommended that the Commission find no probable cause to believe as to the purported violation of 2 U.S.C. §432(e)(4). We have no dispute with that recommendation. We do, however, dispute the recommendation that the Commission take no further action with respect to the alleged violation of 2 U.S.C. §441a(a), and that a finding of probable cause to believe be entered, but that no further action be taken, as to the alleged violation of 26 U.S.C. §9012(f).

The Recommendation as to 2 U.S.C. §441a(a).

The General Counsel's investigation of the complaints filed by the Carter/Mondale Committee and Common Cause in this matter has spanned some two and one-half years, with no discernible result other than the expenditure of an extraordinary amount of time. There is no evidence whatsoever of prohibited coordination of expenditures between NCPAC and its agents, on the one hand, and any authorized Reagan Committee or its agents, on the other. The General Counsel's Brief does claim that an "opportunity" or potential for coordination existed because of the use by the Reagan campaign and NCPAC of certain common vendors; but no evidence of

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prohibited coordination was found. Similarly, the General Counsel has found no evidence of unlawful coordination, notwithstanding Mr. Dolan's social acquaintance, and perhaps even conversations, with certain members of, or consultants to, the official Reagan campaign.

If the General Counsel has found no evidence of a violation of 2 U.S.C. §441a(a) - and he admits in his Brief that he has found none - then the Commission should find no probable cause to believe that a violation of that law has occurred and close the file. NCPAC and those representatives of the official Reagan campaign contacted by the office of General Counsel have all steadfastly denied any forbidden coordination; so, too, have the common vendors deposed in this matter. The General Counsel has found no more than the potential or an opportunity for coordination; and that based only on supposition and conjecture.

No evidence of unlawful coordination has been found because there is none. To recommend, as the General Counsel does, simply that no further action be taken, without a recommendation as to probable cause, does not do justice to NCPAC. In addition, such a recommendation, if adopted by the Commission, does not appear to be authorized by 2 U.S.C. §437g. That statute suggests that the only findings available to the Commission are "probable cause" or "no probable cause."

Moreover, there is an even more compelling reason why the Commission should not accept the recommendation of the General Counsel. The Commission is the agency charged by Congress with enforcement and, through its advisory opinion powers, interpretation of the Federal Election Campaign Act of 1971, as amended. As such, the public in general, and respondents in particular, look to it for intelligible guidance as to what is and is not permitted under the Act. The General Counsel's recommendation disserves the Commission's purpose, for it provides no guidance, either to NCPAC or to the public at large, as to what types of activities or relationships (social or commercial) are permitted under the Act. No lessons can be gleaned from the General Counsel's recommendation as to what constitutes actionable or prohibited coordination under the Act.

So that respondent NCPAC, and the public at large, will know what is unlawful coordination and what is not, the Commission should find no probable cause to believe that NCPAC

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has violated the law on these facts. Such a finding is the only logical finding consistent with the General Counsel's determination that no evidence of prohibited coordination has been found.

The Recommendation as to 26 U.S.C. §9012(f).

Section 9012(f) has been declared unconstitutional by a three-judge district court of the District of Columbia. That decision was affirmed by a 4-4 vote by the Supreme Court. These decisions were rendered in an action brought by the Commission against political committees identical in all material respects to NCPAC, and concerning expenditures substantially the same as those incurred by NCPAC.

The Commission chose not to sue NCPAC in connection with its 1980 expenditures in support of Mr. Reagan's election campaign. The Commission lost the suits it did bring against other committees like NCPAC. Now, however, aware that it probably could not successfully bring an action against NCPAC, the General Counsel nevertheless recommends that the Commission find that NCPAC violated the law, but recommends that nothing be done about it. The General Counsel should not be permitted to have it both ways. The enforceability of 26 U.S.C. §9012(f) has been decided against the Commission - at the very least for the 1980 election cycle, although we contend it has been decided for all elections thereafter, as well.

The Commission, if it adopts the General Counsel's recommendation, will leave NCPAC in the position of having had entered against it a finding that it has violated a law that has been declared unconstitutional, without having had an opportunity to assert that unconstitutionality in its defense. The General Counsel's recommendation leaves the Commission as the only tribunal before which NCPAC can assert that defense. The Commission should decline to enter a finding that NCPAC has violated the law, just as a three-judge district court (undisturbed by the Supreme Court) has done with respect to others identically situated to NCPAC.

Moreover, the General Counsel's thinly-veiled threat that future independent expenditures by NCPAC in support of a publicly-financed candidate would be answered by Commission enforcement proceedings is even more insidious than his

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inconsistent recommendation that the Commission find that NCPAC violated the law but that the Commission should take no action. The General Counsel's threat is apparently intended to frighten NCPAC and others and discourage them from exercising their right to express their support of future presidential candidates through expenditures.

Whether or not the Supreme Court's affirmance has precedential effect, as a matter of judicial economy and sensitivity to the most effective means of spending what tax dollars are allocated to the Commission, no further Commission action with respect to enforcement of 26 U.S.C. §9012(f) should be taken. The constitutionality - and, hence, the enforceability - of that provision has been litigated and decided against the Commission. The Commission should enforce those provisions of the law that have not been determined to be unconstitutional, and should not indulge in a quixotic campaign to litigate again an issue already decided.

As a matter of equity, if for no other reason, the Commission should find no probable cause to believe that NCPAC has violated 26 U.S.C. §9012(f). A court would not so find against NCPAC; this Commission should not do so, either.

Sincerely,

Robert R. Sparks, Jr.

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Docket 2

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 29, 1983

SENSITIVE

Robert R. Sparks, Jr.
Counsel, National Conservative Political
Action Committee
Sedam and Herge
8300 Greensboro Drive
McLean, Virginia 22102

RE: MUR 1252/1299

Dear Mr. Sparks:

Based on a complaint filed with the Commission on July 2, 1980, the Commission determined on September 3, 1980, that there was reason to believe that your client, the National Conservative Political Action Committee, had violated 26 U.S.C. § 9012(f), 2 U.S.C. § 441a(a) and 2 U.S.C. § 432(e)(4). On September 26, 1980, a second complaint was filed also alleging violations of 2 U.S.C. § 441a(a) and 26 U.S.C. § 9012(f) by your client. An investigation of this matter ensued.

After considering all the evidence available to the Commission, the Office of General Counsel is prepared to recommend that the Commission find probable cause to believe that a violation of 26 U.S.C. § 9012(f) occurred, but that no further action be taken; that no further action be taken with regard to the alleged violation of 2 U.S.C. § 441a(a), and that no probable cause to believe be found with regard to the alleged violation of 2 U.S.C. § 432(e)(4). The Commission may or may not approve the General Counsel's recommendations.

Submitted for your review is a brief stating the positions of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies if possible) stating your positions on the issues and replying to the brief of the General Counsel. Three copies of such brief should also be forwarded to the Office of the General Counsel,

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again if possible. The General Counsel's brief and any brief you may submit will be considered by the Commission before proceeding to a vote.

Should you have any questions, please contact Anne A. Weissenborn at (202) 523-4175.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Brief

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	MUR 1252/1299
National Conservative Political Action Committee	)	

GENERAL COUNSEL'S BRIEF

I. Statement of the Case

The issues involved in this matter were brought to the attention of the Commission as the result of complaints filed on July 2, 1980, and on September 26, 1980, by the Carter/Mondale Reelection Committee and the Democratic National Committee, and by Common Cause alleging violations of provisions of the Federal Election Campaign Act of 1971, as amended, and of 26 U.S.C. § 9012(f) by the National Conservative Political Action Committee ("NCPAC"). 1/ On September 3, 1980, the Commission found reason to believe that NCPAC had or was about to violate 26 U.S.C. § 9012(f) by making excessive independent expenditures on behalf of Ronald Reagan, 2 U.S.C. § 441a(a) by making excessive in-kind contributions and expenditures on behalf of Ronald Reagan, and 2 U.S.C. § 432(e)(4) by using the name "Ronald Reagan" in the name of its self-designated "project", "The Ronald Reagan Victory Fund."

Notification of the Commission determinations was sent to NCPAC on September 25, 1980, followed, on October 1, 1980, by a subpoena for production of documents and an order for answers to written questions. (Attached as Exhibit A). NCPAC submitted

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1/ On October 15, 1980, the two complaints were merged to form MUR 1252/1299.

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answers to certain of the interrogatories on October 14, 1980 (Attached as Exhibit B), but objected to others on grounds of unreasonableness, overbreadth and burden on the committee. On October 20, 1980, the committee complied in part with the Commission's subpoena by submitting the documents requested at three specifications. On October 14, 1980, the committee filed a motion to quash or modify the Commission's subpoena, which motion was denied by the Commission on December 16, 1980. On January 9, 1981, NCPAC notified the Commission that it would "not voluntarily comply with the Commission's order directing NCPAC to submit to the requested discovery."

Following receipt of the January 9, 1981 letter from counsel, this Office, on January 23, 1981, filed a petition in the United States District Court for the District of Columbia for an order to show cause why the Commission's subpoena and order should not be enforced. On February 26, 1981, following a hearing, the court granted the requested order; later, on April 16, 1981, the court denied the committee's motion of a stay pending appeal. On May 19, 1981, this Office received the first of a series of additional submissions of documents and answers to written questions from NCPAC. (Latter attached as Exhibit C). The deposition of the chairman of NCPAC has been taken, as have those of the former treasurer of the Reagan for President Committee and the Reagan/Bush Committee, and of the former deputy director for communications of the Reagan/Bush Committee.

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II. Legal Analysis

A. Alleged Violation of 26 U.S.C. § 9012(f)

In 1971, Congress established a system for the public financing of presidential elections. Enacted as the Presidential Election Campaign Fund Act, Pub. L. No. 92-178, 85 Stat. 573 (1971) ("the Fund Act"), this system permits individual taxpayers to participate voluntarily in the funding of presidential election campaigns by means of a $1.00 tax return check-off. Major party candidates who satisfy the eligibility requirements of 26 U.S.C. § 9003 are entitled to equal payments from the fund to defray qualified campaign expenses. Once such a candidate has chosen to accept public funds, he or she may accept private contributions only if they are necessary to make up a deficiency in the Presidential Election Campaign Fund. 26 U.S.C. §§ 9003(b)(2), 9012(b). Such candidates must also pledge not to make qualified campaign expenditures in excess of his or her allotment pursuant to 26 U.S.C. § 9004. 26 U.S.C. § 9001(b)(1). In 1980, this allotment totaled $29.4 million per major party candidate.

Congress was also concerned that the stated legislative purposes of the public financing of presidential campaigns could be undermined by the infusion of private funds into the political process in the form of independent expenditures by unauthorized committees on behalf of the presidential candidates receiving

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public funds. 2/ Congress recognized the potential danger to its goals of controlling the amounts spent in presidential elections and of limiting the influence of private monies in these elections if political committee leaders could raise large numbers of contributions and use this aggregated wealth to defray expenses which would otherwise be qualified campaign expenses subject to the candidate's statutory expenditure limitation.

In order to prevent the undermining of the candidates expenditure limitations and to assure that the receipt of public funds would be a substitute for private funds, not just a supplement to those funds, Congress also included in the Fund Act a limitation of $1,000 on the amount of independent expenditures. an unauthorized political committee may incur to further the election of a candidate for the office of President who is eligible to receive public funds pursuant to 26 U.S.C. § 9003. The addition of what is now Section 9012(f) was designed "to prevent any political committees from being formed as a subterfuge so that they can go beyond the authorization of the

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2/ The stated purposes of public financing were to free the candidates from the rigors of fundraising; promote public discussion of issues; restore public confidence in government; "make a major change that would be a tremendous improvement toward lifting the office of the Presidency above the power of private money to control it," 117 Cong. Rec. 41,947 (1970) (remarks by Senator Long); "take the whole presidential electoral process out of the arena of big astronomical money," 117 Cong. Rec. 42,377 (1971) (remarks of Senator Pastore); and thus "end the most flagrent single abuse of our democracy, the unconscionable power of money." 117 Cong. Rec. 41,778 (1971) (remarks of Senator Kennedy).

committees and make expenditures that were not within the limitations of the expenditures which are in the bill." 117 Cong. Rec. 42,397 (1971) (remarks of Senator Taft).

Any knowing and willful expenditures totaling in excess of $1,000 by unauthorized political committees for goods or services which would constitute qualified campaign expenses if incurred by the committee of the candidate being supported are in violation of Section 9012(f). 26 U.S.C. § 9002(1) defines "qualified campaign expense" as (A) an expense incurred by a candidate of a political party for the office of President or Vice President or by an authorized committee of such candidates "to further" their election to such offices; (B) an expense incurred within the expenditure report period of such candidates (i.e., in the present instance between the date of nomination and thirty days after the presidential election); and (C) an expense the incurring of which is not in violation of law.

On July 24, 1980, the Commission determined that Ronald Reagan, the nominee of the Republican Party for the office of President, was eligible to receive public funds pursuant to 26 U.S.C. § 9003 and certified payment to him of $29.4 million.

In 1980, NCPAC was a multicandidate political committee not authorized by Ronald Reagan to make expenditures on behalf of his candidacy. This committee was and still is funded primarily by means of direct mail solicitations, large dollar contributions, and fundraising dinners. (Deposition of John T. Dolan, Chairman of NCPAC, page 9).

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During 1980, NCPAC reported making $2,102,301 in independent expenditures in support of Ronald Reagan's primary and general election campaigns for the office of President. Ninety-two percent of this amount, or $1,934,117, was spent between July 16, 1980 and January 31, 1981, and $1,819,205 during Ronald Reagan's general election expenditure report period, i.e., between July 16, 1980 and December 4, 1980. These latter expenditures purchased services from political consultants, in particular the Richard A. Viguerie Company and MediAmerica, Inc., which conducted NCPAC's direct mail solicitations; paid for printing, postage and mailing services related to direct mail solicitations; covered certain staff salaries and travel costs; and purchased at least $272,500 in media advertisement production and placement services largely through MediAmerica, Inc., and Time and Space Media Services. These expenditures, which were carried out as part of NCPAC's "Ronald Reagan Victory Fund" project, indicate that NCPAC's 1980 activities in support of the Reagan candidacy covered the full range of campaign activities which any presidential candidate's committee would undertake if not bound by the prohibition against receipt of private contributions and the limitation on expenditures imposed upon recipients of funds from the Presidential Election Campaign Fund. NCPAC solicited contributions on a nation-wide basis and used monies received to make expenditures for media advertising and other means of promoting the candidacy of Ronald Reagan. These

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expenditures in effect permitted the Reagan campaign to benefit from private contributions which it could not itself receive; they also added $1,934,117 to the $29.4 million expenditure limitation of the Reagan candidacy itself. Such receipt of private contributions and supplementation of the candidate's expenditure limitations were exactly what NCPAC intended to achieve by its expenditures. During the deposition taken by this Office by John T. Dolan, Chairman of NCPAC, the following exchange occurred:

> Q - What was the purpose of the Victory Fund, the Ronald Reagan Victory Fund?
>
> A - To help elect Ronald Reagan as President.
>
> Q - In what way?
>
> A - By making independent expenditures on his behalf.
>
> Q - So both the raising of the fund and making the expenditures?
>
> A - Yes. (Dolan Deposition, pages 41-42.)

In its direct mail solicitation letters, NCPAC explained the general election expenditure limitation upon the candidates of the major parties and the inability of Ronald Reagan to accept private contributions or to spend beyond his statutory limit. This information was used to stress the importance of NCPAC's planned expenditures in support of Ronald Reagan, and to urge those being solicited to contribute to NCPAC as a means of contributing to the Reagan campaign effort. For example, one

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such letter, coded L21A, and apparently mailed in the late primary period, contained the following statements:

> As you know, once Carter and Reagan receive the Presidential nominations from their party, their campaigns are given about $21 million each from the Federal Government for the general election campaign.
>
> They are not allowed to raise additional money from individuals or spend more than they are given.
>
> If this is true then Reagan's got an even change of being elected, right?
>
> Wrong! Because as a sitting President Jimmy Carter will have tremendous advanteges over any challenger no matter how low in the polls he may be.
>
> . . .
>
> None of the advantages I have just mentioned will count against the spending limit on Carter's campaign.
>
> You can see that to get Reagan elected is going to take more than just the $21 million his campaign will get from the Government.
>
> Like Carter, Reagan is also going to have to have outside help.
>
> In this case you and me. (Attached as Exhibit D).

In another solicitation letter, coded L20H and apparently also mailed in the late primary period, Mr. Dolan stated:

> Carter can get instant publicity and advertising whenever he wants it just by calling a press conference.
>
> Also, Carter can "buy votes" by promising Federal money, dams, etc., to different communities before the election.

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On top of this, he will have an army of government paid bureaucrats working for his reelection.

Finally, you can bet big labor will be doing everything in its power to help Carter and stop Reagan (they spend over $11 million to help Carter in 1976).

None of these advantages will be counted against the spending limit on Carter's campaign.

But NCPAC with your help will run "independent" pro-Reagan ads to help offset Carter's high advantages. This kind of help could make the difference in the November election. But we must move quickly.

. . .

The ads we produce will be tough, hard-hitting ads that will expose Carter's weaknessess as well as promote Reagan. I have enclosed two of them for you to see.

These ads were written by top notch professionals....

We will run these ads in major cities and places where many voters will be making up their minds between Carter and Reagan in the next few weeks.

. . .

Remember, you will not be able to contribute directly to Governor Reagan's campaign after the convention. But you can help Governor Reagan get elected president by sending your contribution to NCPAC's "Help Reagan" project. (Attached as Exhibit E).

Such solicitation of contributions and making of expenditures by an unauthorized political committee in support of a presidential candidate receiving public funds was exactly what Congress intended to limit by the promulgation of Section

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9012(f). In addition, because $1,819,205 of NCPAC's general election-related, pro-Reagan expenditures were incurred within Ronald Reagan's general election report period and would have constituted qualified campaign expenses if incurred by his authorized committees, the NCPAC expenditures come squarely within the language as well as the intent of Section 9012(f), and consequently within the limitations imposed thereby.

On July 15, 1980, the Commission filed a complaint in the United States District Court for the District of Columbia pursuant to 26 U.S.C. §§ 9010(c) and 9011(b) seeking to implement and construe 26 U.S.C. § 9012(f) as applicable to three political committees. NCPAC was not a party defendant. On September 30, 1980, the three-judge court rendered its judgment and opinion, finding that "(t)he plain language of section 9012(f) proscribes categorically the defendants' planned expenditures," but also declaring 26 U.S.C. § 9012(f) to be unconstitutional. FEC v. Americans for Change, 512 F. Supp. 489, 492, 500-501 (D.D.C. 1980).

On January 19, 1982, the Supreme Court affirmed by an equally divided Court the finding by a three-judge District Court in the District of Columbia that 26 U.S.C. § 9012(f) is unconstitutional. Common Cause, et al. v. Harrison Schmitt, et al., No. 80-846, United States Supreme Court, consolidated with Federal Election Commission v. Americans for Change, et al., No. 80-1067, United States Supreme Court. While the Court's

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decision effectively closes the civil litigation in FEC v. AFC, the equally divided nature of the Court's opinion leaves the issue of the constitutionality of Section 9012(f) still unresolved and thus open. A judgment entered by an equally divided Court is not "entitled to precedential weight". Trans World Airways v. Hardison, 432 U.S. 63, 73 n.8 (1977). See also, Neil v. Biggers, 409 U.S. 188 (1972); Inman v. Baltimore and Ohio Railroad Co., 361 U.S. 138 (1959); and Ohio ex rel Eaton v. Price, 364 U.S. 263 (1960).

Given the law regarding the non-precedential nature of equally divided Supreme Court opinions, the Commission would not be barred from relitigating the issue of the enforceability of 26 U.S.C. § 9012(f). NCPAC has never disputed the fact that the committee made independent expenditures in excess of $1,000 in support of Ronald Reagan's candidacy for the presidency. The chairman of the Committee has acknowledged his awareness of the limitations imposed upon unauthorized committees by Section 9012(f) at the time the determination was made to undertake NCPAC's expenditure project in support of Ronald Reagan. (Dolan Deposition, page 43). Given this admission, it would appear that the element of willfulness required by Section 9012(f) has been demonstrated. The remaining question is, therefore, whether or not to pursue enforcement against NCPAC for its clear violation of this provision.

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In the General Counsel's view, the Commission should consider that it made a strong attempt to enforce the provisions of the statute in the 1980 election. Further attempts could be made by pursuing this and other cases. In the unique circumstances, however, of a deadlocked Supreme Court on the issues as raised in the 1980 election, avoidance of further litigation over the same issue with regard to the election past seems to the General Counsel to be a valid exercise of the Commission's judgment in pursuing cases.

It must be emphasized that Section 9012(f) has not been declared unconstitutional by the United States Supreme Court. NCPAC is thus on notice that any project or program involving more than $1,000 in expenditures on behalf of a presidential candidate receiving funds pursuant to 26 U.S.C. § 9001, et seq., in 1984 or beyond, would be undertaken in the knowledge that 26 U.S.C. § 9012(f) as enacted by Congress remains in effect.

This Office recommends that the Commission find probable cause to believe that NCPAC violated 26 U.S.C. § 9012(f) in 1980 but take no further action with regard to this particular violation.

B. Alleged Violation of 2 U.S.C. § 441a(a)(2)(A)

2 U.S.C. § 441a(a)(2)(A) limits to $5,000 the amount of contributions which a multicandidate political committee can make to any candidate and his authorized committees with respect to any election for Federal office. 2 U.S.C. § 431(8)(A)(i) and

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11 C.F.R. § 100.7(a)(1) define "contribution" as including "anything of value made by any person for the purpose of influencing any election for Federal office." 11 C.F.R. § 100.7(a)(1)(iii)(A) states that "anything of value" includes all in-kind contributions, which are in turn defined as the provision of goods and services without charge or at less than the normal and usual charge. Expenditures made by a political committee which "expressly advocate the election or defeat of a clearly identified candidate, but which are not made with the cooperation, or with the prior consent of, or in consultation with, or at the request or suggestion of, a candidate or any agent or authorized committee of such candidate" are deemed independent expenditures and not in-kind contributions. 2 U.S.C. § 431(17) and 11 C.F.R. § 109.1(a). Therefore, in the present instance, a finding of probable cause to believe that NCPAC violated 2 U.S.C. § 441a(a)(2)(A) would require evidence of cooperation or consultation by NCPAC representatives with an authorized Reagan committee related to the making of NCPAC's expenditures in support of the Reagan candidacy.

1) Organization and Expenditure Authorizations

From September, 1979, through 1980, NCPAC was governed by a Board of Directors composed of John T. Dolan, who also served as Chairman, Rhonda Stahlman and Robert Shortley, and by an Executive Committee composed of the above three individuals plus Curt Clinkscales and J. Curtis Herge. The Executive Committee formulated general policy and was consulted about large

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expenditures, while the Board of Directors maintained "the legal aspects of the organization", but had little to do as a body with the strategy or the authorization of expenditures. (Dolan Deposition, pages 12-14). Mr. Dolan had special authority regarding expenditures, but has stated that generally he never took actions without the concurrence of the Board or the Executive Committee. (Dolan Deposition, page 17).

In response to the Commission's interrogatories, NCPAC provided a listing of all NCPAC personnel, consultants and other agents, and cited persons, in addition to Mr. Dolan, who participated in the authorization of expenditures in support of Ronald Reagan. (Exhibit C, response to Interrogatory B-1). The individuals authorized to make expenditures included Lisa Stoltenberg, who served as political director in 1979 and 1980 working directly under the Chairman; Carl Channell, whose activities involved fundraising meetings and receptions; David Keene, a consultant who was hired to organize the Ronald Reagan Victory Fund; Richard Geske of MediAmerica, who was authorized to produce television commercials and to buy television and radio time; Jimmy Walker, a time buyer with Time and Space Media Services of Memphis, Tennessee; Stuart McLean, who worked on the Ronald Reagan Victory Fund project; Candace Taw, who served as office manager and assistant treasurer from May 1980 to the present; and the Richard A. Viguerie Company, which was responsible for direct mail fundraising. Each of these

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individuals and companies could authorize expenditures within that person or company's area of responsibility. (Dolan Deposition, pages 16-29). According to the testimony of the committee's chairman, Lisa Stoltenberg was not involved in the selection of vendors or the negotiation of contracts, nor did she have much direct involvement in the production of documents and materials. (Dolan Deposition, page 32). Carl Channell was not involved in direct mail fundraising and the expenditures he authorized would have involved printers, caterers, etc. (Dolan Deposition, page 20). Jimmy Walker undertook most of the media time buying for the Ronald Reagan Victory Fund for which she was given a certain amount of money each week and told to buy on certain stations; the criteria were established by Mr. Keene and Mr. Dolan. Mr. Dolan stated that he did not know of any other political committees for which Ms. Walker worked. (Dolan Deposition, page 26). Stuart McLean was specifically designated to work on the Ronald Reagan Victory Fund and his ability to authorize expenditures was limited to office supplies, etc. (Dolan Deposition, pages 27-28). Candace Taw's expenditure authorizations were confined to "office activities, rent, supplies, and servicing the rest of the organization." (Dolan Deposition, page 28).

The Richard A. Viguerie Company was generally responsible for preparing the content of direct mail solicitations, the selection of target populations, the selection of mailing lists

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subject to the approval of Mr. Dolan, and the selection of sub-vendors. As regards the Ronald Reagan Victory Fund, this activity represented the carrying out of overall ideas presented by David Keene to John T. Dolan. (Dolan Deposition, page 31). The roles of David Keene and of Richard Geske will be discussed below.

2) Committee Policy Regarding Independent Expenditures

The Office of General Counsel has attempted to ascertain the knowledge available to NCPAC personnel as to statutory and regulatory requirements pertaining to the making of independent expenditures on behalf of a candidate, any policy formulated to meet these requirements, and the steps taken to disseminate this information and to enforce the maintenance of independence.

In response to questions posed during his deposition, Mr. Dolan testified that "anybody who was in a decision making role at NCPAC was advised they could not communicate with an employee or an agent of the Reagan campaign." (Dolan Deposition, page 65). Mr. Dolan thought there had been "a fairly brief legal memo" circulated to the staff on this issue (Dolan Deposition, page 65); however, the committee has not been able to furnish the Commission with a copy. Mr. Dolan also stated that NCPAC had "a legal memo explaining independent expenditures" which might have been circulated. (Dolan Deposition, page 66). Regarding himself, Mr. Dolan stated that he

> made a deliberate effort . . . on the advice of counsel and, understanding what I do understand about the law, I never discussed

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> with anyone associated with the Reagan campaign or Reagan/Bush campaign about anything NCPAC was doing, intending to do, or had done on behalf of Ronald Reagan on behalf of independent expenditures.
>
> .....
>
> Our sole source of information about what the Reagan campaign was doing and their sole source of information about what we were doing came through the media. (Dolan Deposition, pages 64-65).

3. Application of 11 C.F.R. § 109.1(b)(4)(i)(B); Non-Presumptive Contacts

Pursuant to 11 C.F.R. § 109.1(b)(4)(i)(B), expenditures are to be presumed to have been made by "arrangement, coordination or direction" of a candidate or the candidate's agent or authorized committee if they are

> Made by or through any person who is, or has been, authorized to issue or expend funds, who is, or has been, an officer of an authorized committee, or who is, or has been receiving any form of compensation or reimbursement from the candidate, the candidate's committee or agent ....

Based on this regulation, evidence that personnel of any unauthorized committee, authorized to make expenditures on its own behalf, had once been officers of, or compensated by an authorized committee of the candidate being supported, or that an unauthorized committee had employed the same vendors or consultants as those employed by an authorized committee, would give rise to the presumption that the unauthorized committee had consulted with, or coordinated its activities with, the candidate or his/her authorized committee. Once a presumption is raised,

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it then becomes necessary to examine the facts surrounding an individual or a vendor's relationship to the activities of the respective committees involved in order to determine whether or not the alleged independence of the unauthorized committee's expenditures has apparently been compromised.

In situations where a presumption of coordination would not arise pursuant to Section 109.1(b)(4)(i)(B), evidence should still be sought of contacts through the individual or vendor involved which could point to actual or possible coordination of activities.

A. Involvement of Individuals

The investigation undertaken into the relationship of NCPAC and the Reagan campaign has revealed no movement of Reagan committee officers or persons who received compensation from such a committee from the Reagan campaign to NCPAC, or from NCPAC to the Reagan campaign. John T. Dolan, chairman of NCPAC, testified that he "helped on my own time for Reagan" in 1976, but there is no indication that he was involved in the Reagan campaign in 1979-80. (Deposition of John T. Dolan, page 10). 3/ Mr. Dolan testified that Charles Black and Roger Stone, who were directly involved in the 1979-80 Reagan campaign, helped to co-found NCPAC but left that organization in 1977 and 1978. (See below).

3/ The Commission has not found that employment or association prior to candidacy is presumptive of non-independence. (See AO 1979-80, at 5).

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David Keene was employed by the George Bush for President Committee throughout the 1979-80 primary campaign period up to receiving his final paycheck on August 1, 1980. Beginning August 29, 1980, NCPAC reported expenditures to Mr. Keene for consultant fees, and as noted above, Mr. Keene was authorized to make expenditures on behalf of this committee. (Dolan Deposition, Exhibit C).

During his deposition, Mr. Dolan testified that David Keene was hired for the specific purpose of organizing the Ronald Reagan Victory Fund. (Dolan Deposition, pages 20-21). Although Mr. Keene had some involvement in fundraising, his principal role was working with Mr. Dolan on media production and placement. (Dolan Deposition, page 32; see also, pages 34 and 42).

In its June 19, 1981, supplement to its complaint in this matter, Common Cause alleged that Mr. Keene had been "one of the managers of the 1980 primary campaign for the Republican Vice Presidential candidate, George Bush", and that, because of his role in the Bush campaign, The Ronald Reagan Victory Fund could not "be considered 'independent'". In support of this allegation, counsel for Common Cause cited the Commission's response to Opinion Request No. 777 in which an individual who had worked as a volunteer for the primary campaign committee of Gerald Ford in 1976 was informed through Commission counsel that he could not form a political committee which would be making independent expenditures on behalf of the Ford candidacy during

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the general election campaign, even if he had no further contacts with the Ford general campaign personnel. Common Cause also asserted that the fact that Mr. Keene's prior work was for the Vice Presidential candidate rather than the candidate for the Presidency did not change the situation, although the only support offered for this argument was the general statement that the Presidential Election Campaign Fund Act does not distinguish between Presidential and Vice Presidential candidates who are using public funds.

Contrary to the assertion of Common Cause, the fact that Mr. Keene worked during the primary campaign period for the Vice Presidential candidate is a relevant factor, and distinguishes his post-primary activities from those of the individual whose activities were addressed in OR 777. Such service is not comparable to prior involvement with the Presidential candidate as regards the knowledge of strategy which could be carried over into an ostensibly independent expenditure campaign. Clearly, during the primary period in 1979-80, the Bush campaign was a rival entity totally separate from the Reagan campaign utilizing its own campaign strategies. Therefore, whatever strategy was utilized by the Bush Committee in its campaign against Ronald Reagan would seem to have been without utility in a campaign in support of the Reagan candidacy during the general election campaign period.

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The emphasis placed by Common Cause upon the failure of the Presidential Election Campaign Act ("the Fund Act") to distinguish between the Presidential and Vice Presidential candidates of a political party seeking election together is also not relevant to the issue at hand. The purpose of the Fund Act is to provide for the public financing of presidential elections. Its references to the campaigns of Presidential and Vice Presidential candidates as either separate or joint endeavors relate only to questions of expenditure limitations, the definition of "qualified campaign expense" and other rules applying to the general election campaign. The Fund Act nowhere addresses the issue of involvement with or independence from a Vice Presidential candidate's earlier primary campaign.

Therefore, even though Mr. Keene received compensation from the George Bush for President Committee and later could authorize NCPAC expenditures, it is the opinion of this Office that his prior involvement with the vice presidential candidate's own primary campaign would not give rise to the presumption permitted by 11 C.F.R. § 109.1(b). No evidence of direct contacts between Mr. Keene and the Reagan primary and general campaigns has been found.

B. Use of Common Vendors

The Commission's finding of reason to believe that NCPAC had violated 2 U.S.C. § 441a(a) was based upon the employment by NCPAC of three vendors previously employed by the Reagan for

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President Committee. During the course of its investigation, the Office of General Counsel found several additional vendors and consultants who had received compensation from both NCPAC and the Reagan for President Committee or the Reagan/Bush Committee. This Office has taken the depositions of representatives of those vendors whose employment served as the basis for the finding of reason to believe and questioned both Reagan campaign and NCPAC representatives about the nature and content of services performed by common vendors.

a. Differentiation by Nature of Services

The investigation of the vendors common to NCPAC and the Reagan committees has revealed that certain of them were hired to perform only ministerial functions, while three played more active consultative roles with at least one of the vendee committees involved. The first group apparently had no input into the planning of the ultimate product or in the selection of the components of a particular service, but, rather, were provided with all components by the client and merely performed as instructed. Included in this group are Diversified Direct, Inc., Tri-State Envelope Corp., Wiland and Associates, Metro Printing and Mailing Services, Pyramid Video Tapes and Envelopes Unlimited.

(i) Diversified Direct, Inc.

As noted above, Mr. Dolan testified that much of the direct mail activity undertaken by NCPAC in 1979-80 was handled by the

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Richard A. Viguerie Company of Falls Church, Virginia, that the Viguerie Company was authorized to make expenditures related to direct fundraising, and that the company generally composed the content of mailings and selected mailing lists, both subject to the approval of Mr. Dolan. (Dolan Deposition, pages 29, 30, 31-32).

The Viguerie Company was given the authority to hire sub-vendors. (Dolan Deposition, page 31). According to invoices made available by NCPAC, the Viguerie Company selected Diversified Direct, Inc. as a sub-vendor, this being one of the vendors whose earlier activities on behalf of the Reagan campaign formed the basis for the Commission's finding of reason to believe that NCPAC had violated the Act.

According to testimony provided by Mr. George P. McDonnell, co-founder and former chief executive officer of Diversified Direct, Inc., this company was a printing and mailing company which was formed by the purchase, in July, 1979, of assets of Diversified Mail Marketing, Inc., a printing company owned by Richard A. Viguerie. At the time of his deposition, Mr. McDonnell was employed by the Richard A. Viguerie Company as a creative vice president. (McDonnell Deposition, pages 3-5, 8).

Mr. McDonnell described the activities performed by Diversified Direct, Inc. for clients as follows:

> Directly we performed printing, and we acted as a broker for mailing services, which would be stuffing of envelopes, putting labels on an envelope, putting a stamp on, taking the mail to the Post Office. (McDonnell Deposition, pages 7-8).

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Mailing lists were provided by the client, not maintained by Diversified Direct itself. (McDonnell Deposition, page 9).

According to reports submitted to the Commission by the Reagan for President Committee, expenditures were made by that committee to Diversified Direct on March 24, 1980 ($4,097.29), April 22, 1980 ($1,961.27), May 14, 1980 ($11,614.25) and June 18, 1980 ($17,527.16). (Exhibits A, B and C to McDonnell Deposition; invoices and solicitation letters attached hereto as Exhibit F). Mr. McDonnell confirmed that Diversified performed services for the Reagan for President Committee and stated that these services were performed through the agency of Black, Manafort and Stone. (McDonnell Deposition, page 10. See also Deposition of Angela M. Buchanan, former treasurer of the Reagan for President Committee, page 77). When asked if Diversified Direct's work for Black, Manafort and Stone ever involved discussions of the Reagan campaign, Mr. McDonnell answered "No". He also denied any discussion or suggestions made by Diversified personnel as to how the Reagan campaign should be run. (McDonnell Deposition, page 12).

Mr. McDonnell identified the Diversified Direct invoices sent to the Reagan for President Committee which showed that Diversified Direct had undertaken printing and mailing services for Reagan for President. Identification of sample direct mail pieces and the matching of those pieces to particular invoices proved to be more difficult, partly because Mr. McDonnell did not

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necessarily see all items printed or otherwise handled by his company and also because the actual services performed by the company varied. For example, an invoice could show that Diversified performed printing services involving computer forms, with the actual work involved having been the printing of only the heading, not body copy; or, in other cases, the printing of both the heading and the body copy could have been performed. In still other instances, an offset letter was produced. (McDonnell Deposition, pages 20-21). However, when asked who would have supplied the copy for a solicitation letter printed by Diversified, Mr. McDonnell stated that it was "always the client or his agency." (McDonnell Deposition, page 19). Diversified Direct had no input as to the content of the letters printed. When asked who would have supplied the mailing list, Mr. McDonnell replied, "Always the client." (McDonnell Deposition, page 19).

Reports submitted by NCPAC indicate that this committee also made expenditures to Diversified Direct, Inc. during the 1979-80 election cycle, a number of which were reported as independent expenditures in support of Ronald Reagan. NCPAC's 1980 Reagan campaign-related expenditures were made on May 23 ($1,513.80), June 6 ($1,600), June 13 ($7,528.24), June 20 ($1,125.77), June 27 ($3,200), July 3 ($2,200), July 14 ($600), July 25 ($1,839.15), August 1 ($3,400), August 8 ($2,231.88), August 22 ($2,500), August 29 ($2,000), September 5 ($4,724.35),

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September 19 ($834.10), October 31 ($9,636.29), November 7 ($501.47), November 14 ($835.66), and December 12 ($1,865.69). According to invoices, purchase orders and copies of checks provided to the Commission by NCPAC, the payments through October were for printing services provided between March and August, 1980, for solicitation packages. (See, for example, Exhibits D and E of Dolan Deposition, and Exhibits G and H to McDonnell Deposition; invoices and solicitation letters attached hereto as Exhibits D, E and G). Again, Mr. McDonnell identified the Diversified Direct invoices but was unable to identify the solicitation packages also submitted by NCPAC. When asked if Diversified would have had any input into the text of solicitation materials involved, Mr. McDonnell answered "No". (McDonnell Deposition, pages 43, 46-47). When asked about the source of copy for these same solicitation packages, Mr. Dolan of NCPAC agreed that the Viguerie Company would have supplied the copy in most cases. In answer to the question, "(W)ould Diversified Direct have had any input into the text", Mr. Dolan replied, "No". (Dolan Deposition, pages 75, 77, 80). Mr. Dolan also stated that on several occasions he wrote the copy of the letters. (Dolan Deposition, page 78). According to Mr. Dolan, the Viguerie Company would have supplied the mailing lists for NCPAC solicitations.

The Office of General Counsel has uncovered no evidence contradicting the testimony of Mr. McDonnell and Mr. Dolan as to the role played by Diversified Direct in the activities of the

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Reagan for President Committee and of NCPAC. Based upon that testimony, it is apparent that Diversified Direct played a passive role in its work as a printing and mailing service. It had no creative input with regard to the content of the material printed for either committee, nor did it take the initiative with regard to the selection of mailing lists used. Mr. Dolan has testified that he was not aware, at the time of NCPAC's employment of Diversified Direct, that the Reagan for President Committee had also employed that firm as early as April 22, 1980. (Dolan Deposition, page 80). NCPAC coordinated its business with Diversified Direct through the Viguerie Company, while the Reagan for President Committee dealt either directly with Diversified Direct or through Black, Manafort and Stone. Thus, there was no common intermediary.

Given the passive, almost mechanical nature of Diversified Direct's involvement in the activities of both NCPAC and the Reagan for President Committee, it appears that the use of this vendor by both committees did not undermine the alleged independence of NCPAC's expenditures in support of Ronald Reagan.

(ii) Diversified Mailing Services

Diversified Mailing Services of Waldorf, Maryland, began as a division of Diversified Mail Marketing, Inc., which was, as noted above, a subsidiary of the Richard A. Viguerie Company until July, 1979. Following the purchase of assets of Diversified Mail Marketing by Mr. George McDonnell of Diversified

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Direct, Inc., Diversified Mailing Services continued as an entity still owned by Richard A. Viguerie. (McDonnell Deposition, pages 15-16). According to Mr. McDonnell, Diversified Direct brokered mailings for Diversified Mailing Services. As a mailing house, Diversified Mailing would break apart any computer letters, "fold them, get them into envelopes and then mail them." (McDonnell Deposition, page 18; see Exhibit F-1 for example of joint Diversified Direct and Diversified Mailing Services involvement).

According to reports submitted by the Reagan for President Committee, this committee made two expenditures to Diversified Mailing Services, the first on January 17, 1980, in the amount of $12,787.29 and the second on February 1, 1980, in the amount of $70. Both were reported as being for direct mail expenses. Invoices show that Diversified Mailing Services received at least four deliveries from Diversified Direct which were apparently related to four Reagan for President contribution solicitation mailings sent out in January, February, March and April, 1980. (See Exhibits F-1, F-8, F-18, F-24 and F-25).

NCPAC made numerous expenditures to Direct Mailing Services in 1979-80. These were reported as being for postage, warehousing, mailing services and/or computer services, and either as operating costs or as independent expenditures in support of Ronald Reagan or in opposition to certain candidates for the U.S. Senate. The expenditures in support of the Reagan

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campaign were as follows: May 21, 1980 ($12,600) for postage, and June 27 ($3,200), July 25 ($5,000), August 8 ($7,035.44), August 29 ($3,494.61), October 10 ($5,121.82), November 7 ($4,541.74), November 14 ($11,607.65), December 5 ($4,700), December 12 ($2,500), and December 19 ($2,324), 1980, for mail services, postage, and computer services. (See Exhibits G-1 and G-2 for examples of joint Diversified Direct - Direct Mailing Services activities for NCPAC).

As stated above, Richard A. Viguerie was responsible for direct mail fundraising activities undertaken by NCPAC in 1979-80. The question therefore arises as to whether the common employment of Direct Mailing Services by both NCPAC and the Reagan for President Committee would have been likely to compromise the alleged independence of NCPAC's expenditures in support of the Reagan campaign. According to Mr. McDonnell's testimony, the services performed by Diversified Mailing Services were even more mechanical in nature than were those of Diversified Direct, involving as they did the folding of letters, stuffing of envelopes, etc. There appears to have been little opportunity for Diversified Mailing's services in themselves to provide an opportunity for coordination of meaningful information. On the other hand, given the ownership of Diversified Mailing Services by Richard A. Viguerie and his role in directing NCPAC's fundraising efforts related to its campaign in support of Ronald Reagan, it is possible that knowledge of the

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targets and content of the Reagan mailings was gained as a result of the passage of Reagan solicitation letters through his mailing services firm.

(iii) Tri-State Envelope Corp.

The second vendor, the employment of which formed a basis for the Commission's finding of reason to believe, was Tri-State Envelope Corporation. Tri-State Envelope Corporation is a vendor of envelopes and printing services located in Beltsville, Maryland. Reagan for President Committee reports show payments made to this vendor on March 24, 1980 ($3,460.80 and $410.80), April 22, 1980 ($6,921.71), May 14, 1980 ($4,863.19), and June 18, 1980 ($4,698.07). According to Ms. Buchanan, this company supplied envelopes for direct mail, a statement apparently confirmed by notations on Tri-State invoices. (Documentation attached hereto as Exhibit H).

NCPAC also made expenditures to Tri-State for envelopes and printing on June 20, 1980 ($2,800), June 27 ($1,600), July 3, 1980 ($1,682.76), August 1, 1980 ($4,269.20), August 8, 1980 ($1,569.40), August 29, 1980 ($2,000), September 5, 1980 ($2,822.65), September 19, 1980 ($850), October 17, 1980 ($718.70), and October 24, 1980 ($456.01), which were reported as independent expenditures in support of Ronald Reagan. (Examples of invoices and product attached as Exhibit F-8 to Dolan Deposition; also attached hereto as Exhibit I). Mr. Dolan testified that he did not know at the time of NCPAC's

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transactions that Tri-State had also been employed by the Reagan for President Committee (Dolan Deposition, page 83).

It appears that the providing of envelopes and the printing of a project name on those envelopes could not give rise to the type of coordination necessary to undermine the independence of expenditures made by the second of two purchasers. The vendor would have had no input into the strategy of the campaign or the contents of any mailings involved.

(iv) Metro Printing and Mailing Services

The Reagan/Bush Committee reported an expenditure of $10,800 to Metro Printing and Mailing Services of Sterling, Virginia, on October 22, 1980 for postage. The Reagan/Bush Compliance Fund also made expenditures to Metro Printing on August 15, 1980 ($677.82), August 18, 1980 ($160.01), and August 29, 1980 ($677.82) for printing. Information more recently supplied by the Reagan/Bush Committee regarding its $10,800 payment indicates that this expenditure was made for printing and mailing services as well as for postage, and that the mailing involved was directed apparently toward a particular voter group, veterans. On November 3, 1980, $780.77 was refunded by the vendor. (Documentation attached hereto as Exhibit J).

NCPAC also reported expenditures to the same company during the general election campaign period, including ones on August 1, 1980 ($2,629.75), August 8, 1980 ($7,833.70 and $2,100), August 20, 1980 ($2,167.06), August 29, 1980 ($658.14),

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September 5, 1980 ($1,039.33), September 9, 1980 ($1,742.96), October 10, 1980 ($1,000 and $969.70), October 17, 1980 ($1,950.71), October 24, 1980 ($1,252.88), November 7, 1980 ($600), November 21, 1980 ($1,500), December 3, 1980 ($1,000), December 12, 1980 ($655), and December 19, 1980 ($967.86) for printing. All of the above NCPAC expenditures were reported as independent expenditures in support of Ronald Reagan.

Mr. Dolan testified that NCPAC's employment of Metro Printing and Mailing was both direct and through Richard Viguerie and that Metro would have had no input into the content of what was printed. He also stated that he did not believe he was aware, when NCPAC engaged this vendor, that the Reagan/Bush Committee was also using the services of Metro Printing. "But it was always our position that they did nothing but perform services just as the Post Office and telephone company did the same." (Dolan Deposition, pages 106-107).

It appears that the role played by Metro Printing and Mailing for its clients was not one conducive to coordination of the committees' respective campaigns.

(v) Wiland and Associates

Another common vendor was Wiland and Associates, Inc., a data processing service bureau formerly located in Culpepper, Virginia, and now located in Fredericksburg, Virginia. According to testimony provided by E. Michael Lawrence, Regional Vice President, Wiland and Associates specializes entirely in direct

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marketing. It maintains mailing lists, merges and purges mailing lists, prints computer letters, and analyzes response mailings. Wiland owns no mailing lists, but maintains lists for some of its customers. (Deposition of Michael Lawrence, page 5). The printing undertaken by Wiland can involve the computer printing of names and addresses on a letter format or on labels, but not the printing of the text of a letter itself; however, in the case of laser printing, Wiland could print of the entire text of a letter. (Lawrence Deposition, pages 9 and 18-19). Wiland is not involved in the writing of copy. (Lawrence Deposition, page 7).

Although a subsidiary company of Wiland and Associates, namely, Wiland Market Analysis and List Brokerage Company, was in the past in the business of brokering mailing lists between owners and users, Mr. Lawrence testified that this subsidiary has "been dormant for several years". (Lawrence Deposition, page 9). As regards Wiland and Associates, Mr. Lawrence stated that it was possible that suggestions could be made to one client that it might like to rent a list owned by another client, but that that "wasn't any significant part of the business activity." (Lawrence Deposition, page 10). He also stated that "it would be standard not to" discuss a proposed activity of one client with another. "Whatever we are doing for one client, it's with regard to that client's business only. It's not really a proper matter to discuss that with another client." (Lawrence Deposition, pages 10-11).

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Reports filed by the Reagan for President Committee show that payments were made to Wiland and Associates on February 22, 1980 ($3,925), March 12, 1980 ($1,400), and April 22, 1980 ($5,710.13) for mailing services and printing. (Exhibits 1(a), 1(g) and 1(h) attached to Lawrence Deposition; memoranda attached hereto as Exhibit K). Mr. Lawrence was unable to identify definitely the solicitation materials turned over to the Commission by the Reagan for President Committee as related to expenditures made to Wiland. A memorandum and Diversified Direct invoice also turned over by the Reagan for President Committee seem to show that the first of these payments was for the laser printing by Wiland in February, 1980 of letters on computer forms supplied by Diversified Direct. (See Exhibit K-1). The third payment apparently involved at least the laser printing of names and addresses on a response device included in an April mailing, while the second may have involved the printing of cards to be used in relationship to a phone bank. (Lawrence Deposition, pages 18-21 and 25-31 and Exhibit 1; see also attached Exhibit K-2). As regards the content of letters printed, Mr. Lawrence stated that "(w)e don't really have anything to do with the content. It's more a mechanical or production function." (Lawrence Deposition, page 18). It was the Reagan for President Committee which provided the content of the letters and the mailing lists. (Lawrence Deposition, pages 18-20). It was also the Reagan for President Committee which arranged for any

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shipments of computer forms from Diversified Direct to Wiland. (Lawrence Deposition, pages 21-22). According to the former treasurer of the Reagan for President Committee, Roger Stone was the person with the Reagan campaign who would have contacted Wiland. (Buchanan Deposition, page 78). 4/

NCPAC also reported a series of expenditures to Wiland and Associates during 1980 which were reported as operating expenditures for computer batching and caging services, not as independent expenditures. Mr. Lawrence testified that Wiland's work for NCPAC, which began in the last part of 1978 and extended into August, 1980, was associated with maintaining a part of NCPAC's contributor list. Wiland's specific assignment was to provide a lock-box caging operation, i.e., to collect responses to direct mail solicitations, open them, deposit the checks, "batch" the reply and key punch the reply devices, add the amounts of the donations, and send NCPAC the computer list of donors. (Lawrence Deposition, pages 58-59). Wiland did break down the contributions by mail key, a code identifying the particular appeal involved; however, the meaning of the keys was

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4/ Wiland and Associates was also employed by the Republican National Committee ("RNC"), an authorized committee of Ronald Reagan's, during the 1980 general election campaign period. RNC's expenditures to Wiland were as follows: $2,000.82 on July 24; $81.71 on September 10; $16,754.99 on September 17; $34,776.28 on October 22; and $2,614.23 on November 18. These expenditures were reported as being for "merge/purge services", "printing services", and "computer services". All were reported as itemized operating expenditures, not as coordinated expenditures made on behalf of the Reagan/Bush Committee.

not generally known to Wiland personnel. Mr. Lawrence stated that he remembered no particular involvement with a specifically Reagan-oriented project for NCPAC. (Lawrence Deposition, pages 60-61). He also testified that he did not discuss Wiland's work for NCPAC with anyone from the Reagan for President Committee, nor any work for the Reagan committee with NCPAC personnel. (Lawrence Deposition, page 63).

Mr. Dolan confirmed that the work performed by Wiland and Associates for NCPAC involved maintaining a computer file and collecting and coding contributions from a lock box. He testified that he was not aware of Wiland's employment by the Reagan for President Committee, that NCPAC hired Wiland before that company was employed by the Reagan for President Committee in February, 1980, and that he had not seen the products furnished the Reagan committee. (Dolan Deposition, pages 108-109).

The lock-box caging services performed by Wiland for NCPAC do not appear to have controverted the independence of NCPAC's activities in support of a candidate in that Wiland's role was apparently a mechanical, non-creative one. Wiland personnel saw only the results of NCPAC fundraising, in the form of contributions, not the solicitations or mailing lists being used. Nor were they told the meanings of mail keys or solicitation codes by which they broke down the contributions received. In addition, all persons deposed about Wiland's activities have

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denied any coordinating role. It thus appears that the involvement of Wiland and Associates did not include strategy planning, copy writing, selection of target populations or any other activity indicating an active role in the campaign of either client.

(vi) Pyramid Video Tapes

On September 23, 1980, the Reagan/Bush Committee made an expenditure of $317.28 to Pyramid Video Tapes of Washington, D.C. for tapes. NCPAC also employed this company during the general election campaign period, making expenditures on August 13, 1980 ($110.85), October 15, 1980 ($673.63), and October 30, 1980 ($241.30). Only the last of these three expenditures was reported an an independent expenditure in support of Ronald Reagan.

Mr. Dolan testified that the work undertaken by Pyramid Video for NCPAC involved the combining of parts of commercials, copying them, and sending them to television or radio stations. "What they did was copy the master tape we had and send it out to other stations." (Dolan Deposition, pages 102-103). He responded in the negative to questions of whether he was aware at the time Pyramid Video was employed that the Reagan/Bush Committee was also using the services of this vendor and whether anyone from the Reagan/Bush Committee had viewed the product produced for NCPAC by Pyramid Video. (Dolan Deposition, page 104). Given both the lack of creativity and minimal

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activity involved with this vendor, its employment by both NCPAC and the Reagan campaign would seem not to have jeopardized the independence of NCPAC's expenditure.

(vii) Envelopes Unlimited

According to its reports, the Reagan/Bush Committee made expenditures to Envelopes Unlimited on August 22, 1980 ($772), August 29, 1980 ($1,073.69), September 26, 1980 ($193.33), October 3, 1980 ($1,366.82), October 23, 1980 ($2,551.63), October 28, 1980 ($1,778.16), and November 14, 1980 ($706.99) for printing, office supplies and stationery. During the general election campaign period, the RNC also made a series of expenditures to Envelopes Unlimited for postage, mail services and envelopes; all of these payments were reported as operating expenditures, not as expenditures on behalf of the Reagan/Bush Committee. 5/ NCPAC also made an expenditure to this company on October 27, 1980 ($515.60) for office supplies.

No evidence has been found that NCPAC used Envelopes Unlimited for anything other than the purchase of certain office supplies. There was apparently no creative involvement by this company in NCPAC activities. Therefore, it is the opinion of this Office that the common use of this vendor would not sustain a finding of cooperation and coordination between NCPAC on the one hand and the Reagan/Bush Committee or the RNC on the other.

5/ Expenditures for direct mail services made by RNC on behalf of the Reagan campaign were reported as made to other specific direct mail firms and as in-house RNC services.

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Arthur J. Finkelstein and Associates, MediAmerica, and Nichols Associates make up the second group of vendors which played, in varying degrees, more active roles in the activities of either NCPAC or an authorized Reagan committee, or both. Given the nature and timing of their roles, the possibility of coordination through these particular common vendors appears greater than through the first group discussed above.

(viii) Arthur J. Finkelstein and Associates

Arthur J. Finkelstein and Associates is a consulting firm located in Mount Kisco, New York. Arthur J. Finkelstein served as a director of NCPAC in early 1979.

Reports submitted by the Reagan for President Committee show expenditures made to this firm on September 28, 1979 ($3,000), November 28, 1979 ($6,000), January 24, 1980 ($318.95), February 7, 1980 ($12,000), February 6, 1980 ($396.12), March 24, 1980 ($6,000), April 9, 1980 ($3,000), April 30, 1980 ($206.02), and June 5, 1980 ($3,044). According to these reports and to invoices submitted by Finkelstein, the payments totaling $18,000 made on February 7 and March 24, 1980 were for telephone polls conducted in Iowa in November and December, 1979, the payments totaling $12,044 made on November 28, 1979 and on April 9 and June 5, 1980, were for political consulting performed in 1979 and January and February, 1980 by Arthur J. Finkelstein, and the remainder involved reimbursements for travel expenses. (Invoices attached hereto as Exhibit L). The Reagan for President

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Committee has refused to produce voluntarily the results of the Iowa poll as requested in the Commission's subpoena for production of documents. (Deposition of Angela M. Buchanan, former treasurer of Reagan for President Committee, pages 63-64).

In his July 1, 1982 response to written questions posed by this Office, Mr. Finkelstein stated that the "total scope" of services performed for the Reagan for President Committee encompassed a review of Ronald Reagan's announcement speech, the poll in Iowa noted above, and "occasional phone conversations concerning strategy -- plus perhaps three or so days of work: one in New Hampshire, one in California and a one hour speech in Wisconsin." He asserted that all services for this Committee were terminated on February 28, 1980, and, in response to the question of whether he maintained contacts with this Committee after completion of his final assignment and through the remainder of 1980, he stated that neither he nor anyone else at Arthur J. Finkelstein, Inc., had any further contact with the representatives of the Committee. (Questions and response attached hereto as Exhibit M-1 and 2).

In his response of July 28, 1982, to follow-up questions posed by this Office, Mr. Finkelstein elaborated somewhat upon his earlier answers by stating that he could not recall the telephone conversations cited, but that they were "by and large from people with the Committee who knew me from previous campaigns...." Three were from Frank Donatelli, the Committee's

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Mid-West Coordinator, who asked that Mr. Finkelstein speak in Wisconsin, from Elizabeth Doyle in New York State, and from the New Hampshire State Chairman Senator Gordon Humphrey. According to Mr. Finkelstein, his day in California involved a review of Ronald Reagan's announcement speech, with his Committee contact there being John Sears; during his stay in New Hampshire, he looked at the Committee's campaign plan and suggested buying television time for older voters, and in Wisconsin, he gave a speech before a rally of Reagan volunteers. (Questions and response attached hereto as Exhibit M-3 and 4).

Reports submitted to the Commission by NCPAC show a significant number of expenditures made to Arthur J. Finkelstein and Associates in 1979 and 1980. These expenditures were reported either as in-kind contributions to named Congressional candidates, as independent expenditures in opposition to particular candidates for the Senate, or as reimbursement of expenses. None was reported as an independent expenditure in support of Ronald Reagan.

Two of the specific bases for the Commission's finding of reason to believe that NCPAC had violated 2 U.S.C. § 441a(a) were reported expenditures made by NCPAC to Arthur J. Finkelstein and Associates on June 5, 1980, in the amounts of $1,000 and $1,416.69, the purposes of which were reported as a "Survey - In Kind to Napier S.C.-6" and "Reimbursement of Expenses".

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Regarding the South Carolina survey, information supplied by NCPAC in response to the Commission's subpoena included a copy of the poll questions and results of a September, 1979 survey in that state and an invoice and two letters dated October 16, 1980, to NCPAC counsel from Arthur J. Finkelstein and Associates explaining the purpose of the June 8 payments. (Exhibit J to Dolan Deposition, page 5; letters also attached hereto as Exhibit N-1 and 2). One of these letters contains the statement that "(i)n the past, Arthur J. Finkelstein and Associates has done survey work for the National Conservative Political Action Committee only for Senate, Congressional and state elections." (Exhibit N-2).

During his deposition, Mr. Dolan stated that "every survey asks questions about prominent political leaders. But each survey consists of between 50 and 100 questions." He acknowledged that there probably were "one or two questions" relating in some way to the Reagan candidacy among the South Carolina survey questions, but stated that "that is true for every pollster in America, I assume." (Dolan Deposition, pages 95 and 97-A). In one of the letters to counsel, cited above, Ronald W. Finkelstein of Arthur J. Finkelstein and Associates stated that "(i)n every (survey) no statements advocating either the election or defeat of any candidate existed." (Exhibit N-2).

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The survey undertaken in South Carolina included both candidate and issue oriented questions and also a series of questions regarding the background of the person being questioned. (Survey questions attached as Exhibit N-3). Only one question named a presidential candidate as one of eight persons or entities about which the respondent was asked to express an opinion, and none appears to reflect special knowledge obtainable only from the Reagan campaign.

The other expenditure made by NCPAC on June 5 to Finkelstein apparently was reimbursement for travel related to Arthur J. Finkelstein's participation in candidate schools held by NCPAC in Washington, D.C. and Los Angeles in February, March and April, 1980. (See Exhibit N-4). According to the NCPAC chairman, these candidate schools involved only congressional candidates. (Dolan Deposition, page 99). Mr. Finkelstein has stated that he spoke at NCPAC campaign schools without compensation. (Exhibit M-2).

Two additional expenditures in the amounts of $2,000 and $10,200, made by NCPAC to Arthur J. Finkelstein and Associates on May 9, 1980 and November 13, 1980, respectively, were reported as operating expenses for a "survey" and a "voter survey". No candidates were mentioned in the committee's reports.
Mr. Finkelstein has stated that the May 9 payment was for a survey conducted in the 5th Missouri Congressional District and involved the feasibility of defeating Congressman Richard Bolling, while the November 13 payment was for a poll taken in

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Iowa which was for the purpose of probing the feasibility of defeating Senator John Culver. (Exhibit M-2).

The letter from Arthur J. Finkelstein and Associates to NCPAC counsel quoted above also contains the statement that "NCPAC paid for and saw only its surveys." (Exhibit M-2). During his deposition, Mr. Dolan confirmed this statement and added, "It would be unethical to show they surveyed anyone else. And Mr. Finkelstein has never done that without permission of the client." (Dolan Deposition, pages 100-101).

The chairman of NCPAC has also testified that "(u)nder no circumstances did I ever discuss with (Mr. Finkelstein) the Reagan campaign for the purposes of our independent expenditures or his work, what they were doing." (Dolan Deposition, page 100). In his response to written questions, Mr. Finkelstein has stated that he "never informed representatives of NCPAC of information concerning the Reagan for President Committee's, or the Reagan/Bush Committee's strategy..." and that no such information was used in the formulation of NCPAC survey questions. "Nor was I aware, other than through normal news channels, of the Reagan or Reagan/Bush strategies." (Exhibit M-2).

The fact of the common employment of Arthur J. Finkelstein by the Reagan for President Committee and by NCPAC, the fact that NCPAC's employment of this firm took place simultaneously with, or only shortly after that of the Reagan committee, and the fact

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that Finkelstein was actively involved with the two clients, having even served as a director of NCPAC into 1979, create a situation clearly addressed by 11 C.F.R. § 109.1(b)(4)(i)(B) and would support a finding of probable cause to believe that NCPAC violated 2 U.S.C. § 441a(a)(2)(A). The assertions by Finkelstein that the surveys conducted by that firm for NCPAC and Mr. Finkelstein's involvement in NCPAC's campaign schools pertained only to state and Congressional candidates, together with the denials by Mr. Dolan and by Mr. Finkelstein that NCPAC saw copies of polls other than their own or otherwise benefited from Mr. Finkelstein's knowledge of Reagan strategy must be taken into consideration. However, the evidence of active involvement by Arthur J. Finkelstein and his company in both campaigns is not completely outweighed by the bare denials of Mr. Finkelstein and Mr. Dolan.

(ix) MediAmerica

MediAmerica, Inc. is a media production and advertising firm located in Alexandria, Virginia. Reports filed by the Reagan for President Committee show expenditures to MediAmerica of $10,000 on January 2, 1980, $8,589.33 on February 21, 1980, $3,000 on May 2, 1980, and $4,000 on October 29, 1980, for telephone banks, and $8,000 on February 8, 1980 for promotional materials. 6/ The

6/ The committee's former treasurer testified that "promotional materials" should read telephone fundraising. (Buchanan Deposition, page 67).

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INTERROGATORY B(2)

John T. Dolan

Lisa Stoltenberg

David Keene

Richard Gueske

Candace Taw

Stuart McLean

Carl Channell

The Viguerie Company

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former treasurer of the Reagan for President Committee testified that Roger Stone would have been responsible for hiring this firm to do telephone fundraising. (Buchanan Deposition, page 66). To the best of her knowledge, MediAmerica did not place media advertisements for the Reagan committee.

Reports filed by NCPAC also contain expenditures made to MediAmerica. These include payments of $8,075.89 on April 17, 1980, $8,500 on July 11, 1980, $5,000 on August 21, 1980, and $5,000 on September 10, 1980, for production costs; $208 on April 28, 1980 for delivery costs; $3,000 on July 16, 1980, $13,200 on July 22, 1980, $1,625 on September 23, 1980, $2,500 on September 25, 1980, $11,110 on October 7, 1980, $15,484.37 and $785.22 on October 15, 1980, $1,961.02 on October 16, 1980, $3,200 on October 21, 1980, $3,618.20 on October 22, 1980, and $1,975 on October 27, 1980, for media buys; $2,000 on August 8, 1980, for advertising; $5,727.44 on August 8, 1980, $21,536.25 on September 25, 1980, $15,900.63 on October 3, 1980, $8,618.50 on October 10, 1980, $41,498.07 on October 27, 1980, $37,497.79 on November 3, 1980, $56,333.48 on November 4, 1980, and $21,460.22 on November 12, 1980, for advertising, production costs, mailing services and mail list rentals; $168 on August 8, 1980, $26,103 on August 29, 1980, $25,038 on September 5, 1980, $13,500 on September 24, 1980, $33,750 on September 29, 1980, $44,850 on October 9, 1980, $2,325.60 on October 16, 1980 and $10,300 on October 17, 1980, for postage; $29,996.64 on October 16, 1980,

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for mail list rental and telephone fundraising; and $5,200 on October 29, 1980, $545.95 on September 3, 1980, $4,438.90 on September 5, 1980, $1,750 on September 4, 1980, and $1,001.60 on September 19, 1980, for typing, printing and computer services. All of these expenditures were reported as independent expenditures in support of Ronald Reagan.

During his deposition, Mr. Dolan testified that G. Richard Geske of MediAmerica was authorized by NCPAC "to produce television commercials and to buy time on selected television stations and radio stations". (Dolan Deposition, page 24). "(H)e was given general discretion to come up with commercials in the early part of the campaign...." (Dolan Deposition, page 34). Mr. Dolan also testified that he didn't remember when he knew that MediAmerica had performed services for the Reagan for President Committee. He denied discussing the nature of MediAmerica's services for the Reagan Committee or ever seeing the content of materials produced for the Reagan Committee or discussing the targets of Reagan Committee activity. (Dolan Deposition, page 88). The former treasurer of the Reagan for President Committee testified that she was not aware that NCPAC had employed MediAmerica in 1980. (Buchanan Deposition, page 68).

As with Arthur J. Finkelstein and Associates, the facts involved in the employment of MediAmerica by both NCPAC and the Reagan for President Committee appear to present the type of

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opportunity for coordination envisioned by 11 C.F.R. § 109.1(b)(4)(i)(B). Richard Geske of MediAmerica was directly and deeply involved in the media strategy of NCPAC as part of its independent expenditure program in support of Ronald Reagan. This NCPAC involvement was simultaneous with, or just after, MediAmerica's telephone fundraising work for the Reagan campaign. The types of activities performed for each client differed, but the opportunity for MediAmerica to perform a coordinating role did exist. We are confronted by the testimonial denial of Mr. Dolan that he ever discussed MediAmerica's work for the Reagan committee; this denial does not, however, offset completely the factor of opportunity.

(x) Ed Nichols Associates

Ed Nichols Associates, located in Bethesda, Maryland, is a direct mail firm. Reports filed by the Reagan for President Committee show expenditures made to this firm on September 19, 1979 ($1,200), November 21, 1979 ($10,000 and $8,297.35), November 27, 1979 ($15,000, $6,000 and $7,200), December 3, 1979 ($10,000), December 12, 1979 ($23,001.05), December 19, 1979 ($6,000 and $579.61), February 6, 1980 ($14,464.03), February 7, 1980 $21,947.20), March 10, 1980 ($29,663.39), March 12, 1980 ($10,000), March 17, 1980 ($30,046), March 31, 1980 ($20,254), April 9, 1980 ($40,000), April 25, 1980 ($30,814.78), May 23, 1980 ($19,218.25), June 10, 1980 ($1,001.10), and July 30, 1980 ($8,800.35) for direct mail expenses, consulting fees, travel

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reimbursement, a truck rental and telephone banks. The Reagan/Bush Committee reported an expenditure of $27.25 made to Ed Nichols on September 28, 1980, for "refreshments reimbursement". The former treasurer of the Reagan committees testified that Ed Nichols and Associates was hired by Charles Black to perform services for the Reagan for President Committee involving political direct mail, including consulting with the committee on the advisability of doing mailings, etc. (Buchanan Deposition, pages 70-71).

Reports submitted by NCPAC include an expenditure made by that committee to Ed Nichols Associates on November 19, 1980, in the amount of $18,358.00 for mail list rental, mail services, postage and courier service. Although Mr. Dolan could not recall the specifics of this expenditure, he did testify that either NCPAC or the Richard Viguerie Company would have provided the text for the mailing and that Ed Nichols would not have had any input into its content. He stated that he recalled no direct dealings with Mr. Nichols about Ronald Reagan or NCPAC's independent expenditure program, that he was not informed of the content of direct mail services performed by Ed Nichols Associates for Ronald Reagan nor of the target states involved, and that to his knowledge, no representative of the Reagan committees was informed of the content and nature of NCPAC's direct mail activities performed through Ed Nichols. (Dolan Deposition, pages 90-93).

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Ms. Buchanan testified that she was not aware that Ed Nichols Associates had also been employed by NCPAC during 1980. (Buchanan Deposition, page 73).

Again, the active, consultative role played by Ed Nichols and Associates with the Reagan for President Committee would appear to have placed that firm in a position to coordinate the activities of the Reagan campaign and of another client such as NCPAC which was undertaking its own activities in support of the Reagan candidacy. On the other hand, Mr. Dolan has testified in effect that the involvement of Ed Nichols and Associates with NCPAC was not a creative one; he also has denied acquiring any knowledge of this firm's activities for the Reagan campaign. 7/

4. Conscious Parallelism and Indirect Communication

In its complaint, Common Cause cited as evidence of coordination the respondents' "plans to complement and supplement each other's activities. . . . Each Respondent is consciously attempting to conduct a parallel shadow campaign." This accusation of conscious parallelism was apparently directed toward the selection of geographic areas of concentration by the respondents with regard to media advertising, provision of volunteers, etc. Such selection was deemed by the complainant to

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7/ In the supplement to its complaint, Common Cause cited Systems '80 of Bethesda, Maryland, as another vendor common to the RNC and to NCPAC. This Office has not found evidence of expenditures made to this vendor by the RNC in the reports submitted by that committee in 1980.

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be sufficient to show actual agreement between the Reagan committees and the unauthorized committees, including NCPAC.

Common Cause and the Carter/Mondale Committee also argued that the respondents, including NCPAC, were indirectly communicating with each other through the press, with coordination the result. In the latter regard, Common Cause cited the language of 11 C.F.R. § 109.1(b)(4)(i)(A) as restated in AO 1979-80. According to this provision of the Commission's regulations, expenditures will be presumed not to be independent if they are

> Based on information about the candidate's plans, projects, or needs provided to the expending person by the candidate or by the candidate's agents, with a view toward having an expenditure made.

The concept of conscious parallelism is derived primarily from anti-trust law. The principal cases on this subject are Theatre Enterprises v. Paramount Film Distributing, 346 U.S. 537 (1954); and Delaware Valley Marine Supply v. American Tobacco, 297 F.2d 199 (3d Cir. 1961), cert. denied, 369 U.S. 839 (1962). In Theatre Enterprises, the Supreme Court determined that a finding that competitors consciously acted in a parallel fashion does not in itself establish a conspiracy for purposes of the Sherman Act. According to the court in Delaware Valley, conscious parallelism "is circumstantial evidence, the probative value of which necessarily varies with the kind of parallelism and the factual setting where it is found." at 203.

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Delaware Valley cites several factors which, together with conscious parallelism, can lead logically to an inference of conspiracy, namely

1) the unlikelihood of numerous parties reaching one of several possible conclusions; and,

2) action in apparent contradiction of a party's self-interest. (at 205-206)

Other such factors which have been present in cases in which conspiracy has been found are:

1) a radical departure from past practices (See e.g., Interstate Circuit, Inc. v. U.S., 306 U.S. 208 (1939);

2) express or implied request for agreements (Interstate Circuit, supra);

3) opportunity to agree;

4) earlier finding of conspiracy (Theatre Enterprises, supra).

Generally, two or more of these so-called "plus factors" have been present in cases where a conspiracy has been found. (James R. McCall, Sum and Substance of Antitrust, Center for Creative Educational Services, pp. 134-136).

Not all of these anti-trust-related plus factors would be applicable in the context of election campaigns. The unlikelihood of two committees making the same decision as to the substance of solicitations, the targeting of media campaigns, etc., would appear to be a relevant factor, as would express or implied requests for agreements, opportunities to agree and

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earlier findings of cooperation or consultation between two committees. Contradictions of self-interest do not appear relevant, nor do radical departures from past practice in light of the shifting natures of campaign issues and of the responses of political committees thereto.

Application of plus factors to the selection by NCPAC of certain target areas does not provide support for a finding of cooperation or consultation. No evidence has been found that this committee ever received an express or implied request from the Reagan committees for a division or sharing of geographical responsibility, ever selected targets unusually similar to those of the Reagan campaign in a situation where many targets were possible (see below), was represented at a meeting where an opportunity to agree was present, or has previously been found to have cooperated in a way similar to the activity here alleged.

Common Cause in its complaint interpreted Section 109.1(b)(4)(i)(A) as including within the definition of "information . . . provided to the expending person . . . with a view toward having an expenditure made", information which is supplied by one committee to the press, published, and then used as a basis for action by another committee. In the view of the complainant, the Reagan committee released such information "with a view toward having expenditures made by Respondents", a "mutual understanding exist[ed] to that effect", and "Respondents have acted on the basis of that understanding." Common Cause complaint, pp. 16-17.

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Absent a showing of an actual agreement to use the media for purposes of coordinating activity, it would be very difficult to sustain a finding of cooperation and coordination based upon press releases and subsequent use of the information contained therein. The statutory definition of "independent expenditure" cites possible relationships ranging from "in cooperation with" to "at the suggestion of" with the latter seeming to be the weakest link deemed sufficient to undermine the independence of an expenditure. The Report of the Committee on House Administration which accompanied the 1976 House bill amending the Federal Election Campaign Act contained the following explanation for this phase:

> In the definition of "independent expenditures", the phrase "at the . . . suggestion of . . ." is intended to include direct suggestions made by a candidate or his agent . . . . or any other person responsible for reporting contributions and expenditures . . . . It is not the Committee's intent to hold a candidate responsible for suggestions by persons over whom he does not exercise control. Further, for example, if a candidate or some other person suggests in a speech to a group of persons that everything possible should be done to defeat the opponent of the candidate, it is not the intent of the Committee that such a reference in a speech be viewed as a "suggestion" for purposes of the definition. H. Rep. No. 917, 94th Cong., 2d Sess., 5 (1976). (Emphasis added.)

The Conference Report which accompanied S. 3065, the bill containing the amendments finally approved, contained the statement "that advocacy of the election or defeat of a candidate or a general request for assistance in a speech to a group of

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persons by itself should not be considered a 'suggestion' that such persons make an expenditure to further such election or defeat." The Report also stated that it was the Conference Committee's intent to define "independent expenditures" in a manner consistent with the discussion of such expenditures contained in Buckley v. Valeo, 424 U.S. 1 (1976). H. Conf. Rep. No. 1057, 94th Cong., 2d Sess., 38 (1976). The Court in Buckley emphasized the absence of "prearrangement" and "coordination" in distinguishing between independent expenditures and contributions. at 47.

It appears that Congress intended to require direct communications between a candidate and his or her authorized committee or agent on the one hand and an unauthorized committee on the other before the independence of the latter's expenditures in support of the candidate could be jeopardized. Indirect and uncoordinated communications through the press would not come within the definition of even "suggestion", let alone "in concert with" or "at the request of", etc.

The chairman of NCPAC has freely admitted that they used press stories to decide where to make their expenditures. (Dolan Deposition, pages 64-65). However, no evidence has been found of an agreement with a Reagan committee to use the press for this purpose.

5. Additional Contacts

Examination of telephone bills submitted by NCPAC pursuant to subpoena has revealed one thirty-five minute telephone call

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billed to the NCPAC headquarters and made to Reagan for President headquarters in Salt Lake City, Utah, on July 25, 1980, at 5:39 p.m. When questioned about this call, which originated at the Quality Inn in Alexandria, Virginia, Mr. Dolan stated that on the date the call was made the National Conservative Fund was holding a campaign manager's school at that hotel and that he had had an arrangement whereby he could use the hotel office's telephone and charge the NCPAC office. He speculated that the call at issue might have been one he had made in response to a message, but he could recall no details. (Dolan Deposition, pages 111-117). Later, counsel submitted a statement that "Mr. Dolan has no recollection whether he made the telephone call to Utah" and that "NCPAC has not learned who else might have made that telephone call." Mr. Dolan stated that "for the record at no time did I ever discuss with anybody strategy about the Reagan campaign or our activities or anything else." (Dolan Deposition, page 118). He also testified that NCPAC was interested in non-presidential races in Utah, and that if he had known he was calling Reagan headquarters there "I probably would have noted something for the record." (Dolan Deposition, page 118).

One of the bases for the Commission's finding of reason to believe that NCPAC had violated 2 U.S.C. § 441a(a) was the payment by the Reagan for President Committee of $2,200 to NCPAC for an IBM memory typewriter. The fact that the sale had taken place appeared to indicate the existence of an avenue of

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communication between the two committees which could be utilized for purposes of coordination.

Documents submitted by NCPAC and the Reagan for President Committee show that the sale of the typewriter was negotiated by Lisa Stoltenberg, Office Manager for NCPAC and by Neal Peden of the Reagan campaign allegedly as a result of NCPAC's desire to update its office equipment. (Exhibit 2 to Dolan Deposition; also attached hereto as Exhibit O). Mr. Dolan has testified that Ms. Peden first contacted him to inquire about memory typewriters and he referred her to the NCPAC treasurer, Becki C. Burlingame. He was later consulted about price, but recalled no other facts. (Dolan Deposition, page 48). In a letter dated February 22, 1980, the NCPAC treasurer wrote to Ms. Peden requesting payment. No evidence of other contacts has been found between Mr. Dolan, Ms. Burlingame or Ms. Stoltenberg on the one hand and Ms. Peden or Ms. Buchanan of the Reagan for President Committee on the other. 8/

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8/ According to documents furnished by both committees, the Reagan committee took possession of the typewriter in October, 1979, but NCPAC did not report the receipt of payment until July 15, 1980. On February 22, 1980, a request for payment was sent to Ms. Peden by Ms. Burlingame. (Dolan Deposition, Exhibit 2).

When asked if there had been any disagreement between the committees as to the necessity for payment, Mr. Dolan stated that there had been none that he recalled; he testified that the typewriter was never intended to be an in-kind contribution. (Dolan Deposition, pages 48-49). No explanation has been given for the lateness of the Reagan Committee's payment.

NCPAC did not report the making of any contributions to the Reagan for President Committee; therefore, even if the lateness of the payment by the RFP would cause its use of the typewriter between

During his deposition, Mr. Dolan was asked about his relationships and campaign-related contacts with a series of individuals involved with the Reagan campaign, including the candidate himself. Mr. Dolan testified that Mr. Reagan had signed fundraising letters for NCPAC in 1976 and 1977, but had stopped this activity in the latter year. (Dolan Deposition, page 45). Mr. Dolan stated that NCPAC did receive letters signed by Mr. Reagan during 1980 but that these were letters signed for his own campaign and for other candidates for office, not personal letters. (Dolan Deposition, page 45). When asked about other communication with Mr. Reagan in 1979-80, Mr. Dolan stated, "I don't ever recall speaking to Ronald Reagan by phone. And I could probably recount every single meeting I have had with him, and none during that time." (Dolan Deposition, page 46).

Additional individuals about whom Mr. Dolan was questioned were Anthony Dolan, Franklyn C. Nofziger, Paul Russo, Roger Stone, and Charles Black. Mr. Dolan testified that Anthony Dolan

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8/ (footnote continued)

October, 1979, and July, 1980, to be an in-kind contribution by NCPAC, no violation of 2 U.S.C. § 441a(a) would have occurred on the basis of this transaction alone, given NCPAC's $5,000 limitation.

The facts that NCPAC never reported the $2,200 as a debt owed by the Reagan for President Committee, but only as a receipt on July 15, 1980, and that the Reagan for President Committee began to report the $2,200 as a debt owed NCPAC only in July, 1980, constitute apparent violations by both committees of 2 U.S.C. § 434(b)(8). This Office does not recommend pursuit of those violations in light of the committees' eventual reporting of an expenditure and the receipt of that expenditure.

is his brother and that the latter was employed by both the Reagan for President Committee and the Reagan/Bush Committee during the 1979-80 campaign period. He stated that Anthony Dolan was an assistant to William Casey, Reagan campaign director, but that he did not know his brother's duties. He stated that his conversations with his brother were kept to social topics "because we knew we were contemplating independent expenditures" and he testified that there was a formal understanding to this effect. Mr. Dolan responded in the negative when asked whether he had ever discussed NCPAC's plans for supporting Mr. Reagan's candidacy with his brother, whether he told his brother to which states NCPAC planned to give attention, and whether he had ever shown his brother drafts of NCPAC fundraising letters. He also denied that he had received any advice from Anthony Dolan about the content of letters, that his brother had acted as an intermediary between NCPAC and the Reagan staff, and that his brother had done any work for NCPAC at any time. (Dolan Deposition, pages 49-51).

Franklyn C. Nofziger served as press secretary for the Reagan for President Committee and as Deputy Campaign Director for Communications for the Reagan/Bush Committee. Mr. Dolan testified that he has known Mr. Nofziger since the mid-1970's as a political consultant and as a business partner. (Dolan

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Deposition, pages 54-55). 9/ He also testified that he could not recall speaking with him in 1979-80, that he never discussed with him NCPAC's plans with regard to its efforts on behalf of Ronald Reagan, that he never showed Mr. Nofziger drafts of NCPAC fundraising letters or scripts for media spots nor informed him of NCPAC's plans for targeting particular states, and that he never sought his advice on these subjects. Mr. Dolan also testified that Mr. Nofziger never consulted Mr. Dolan about Reagan/Bush strategy. Mr. Dolan stated that he was "pretty certain" that Mr. Nofziger never had done any work for NCPAC. (Dolan Deposition, page 57). Mr. Nofziger's testimony during his deposition corroborated that of Mr. Dolan discussed above. (Nofziger Deposition, pages 25-26).

Regarding Paul Russo, who was employed by both the Reagan for President Committee and the Reagan/Bush Committee, Mr. Dolan testified that he has known Mr. Russo for probably five years, and that while he probably did talk with him during the 1979-80 election campaign, he could recall no such conversation. Again, Mr. Dolan denied having talked to Mr. Russo about NCPAC's strategy on behalf of Mr. Reagan, having shown him drafts of

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9/ Mr. Dolan, Mr. Nofziger, David Keene, Roger Stone and Paul Russo were partners in the ownership of an office building in Alexandria, Virginia. Mr. Nofziger testified that this was a limited partnership and that there were no business discussions between himself and Mr. Dolan. (Deposition of Franklyn C. Nofziger, page 24).

scripts for radio or TV spots, having informed him of NCPAC plans for targeting particular states, or having sought his advise about fundraising letters or the content of media spots. Mr. Dolan stated that to the best of his recollection, Mr. Russo had never worked for or consulted with NCPAC. (Dolan Deposition, pages 58-60).

Roger Stone, who served as regional director for New York and Connecticut for the Reagan campaign committees, was one of the founders of NCPAC in 1975 and served as treasurer of this committee until he left NCPAC in 1977. NCPAC reports show that as late as January, 1979, Mr. Stone acted as one of five endorsers of a loan obtained by NCPAC from the First American Bank of Virginia. (This loan was completely repaid by April 27, 1979). Mr. Dolan testified that he was sure that he did talk with Mr. Stone during the 1979-80 campaign period, but that "at no time did I discuss (with Mr. Stone) NCPAC independent expenditure strategy on behalf of Ronald Reagan. It was all social conversation, and may have related to other political things that had nothing to do with the Presidential race." (Dolan Deposition, page 61).

Charles Black was employed by the Reagan for President Committee as political director from early 1979 until February, 1980. Like Roger Stone, he was one of the founders of NCPAC, which he left in 1977 or 1978. Mr. Dolan testified that he did talk with Mr. Black during the 1979-80 election campaign period,

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and that "at no time did we ever discuss the strategy of the Reagan campaign as it related to the Presidential race or independent expenditures. And he never saw scripts or requested information." (Dolan Deposition, pages 62-63).

In summary, this Office's investigation has revealed no evidence of direct contacts between NCPAC and Reagan campaign personnel which involved coordination of activities related to the Reagan campaign. The chairman of NCPAC has asserted that any contacts which may have taken place were not concerned with the presidential campaign, but rather, were social in nature or, as regards the telephone call to Utah, may have involved state campaigns. No information obtained concerning the Reagan committees has been found to contradict these assertions.

6. Summary and Conclusion

To summarize, this Office's investigation of possible violation by NCPAC of 2 U.S.C. § 441a(a)(2)(A) has sought evidence of cooperation or coordination with authorized Reagan committees by examining NCPAC"s internal organization and policy with regard to maintenance of independence from the Reagan campaign, the use of common vendors, any prior involvement of NCPAC personnel, or agents other than vendors, with an authorized Reagan committee and vice versa, any direct contacts between NCPAC and Mr. Reagan or his authorized committees, and conscious parallelism as to campaign activities and indirect communication through the press.

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- No prior involvement by NCPAC personnel with the 1979-80 Reagan authorized campaign committees has been uncovered. Certain individuals involved in the 1980 Reagan campaign had had previous involvement with NCPAC; however, these persons had left NCPAC well before the beginning of the 1979-80 campaign period, and no evidence has been found that NCPAC received information from these persons in 1980 regarding the Reagan campaign. Nor have any election-related "plus factors" been found to support a finding of conscious parallelism in campaign targets and techniques. NCPAC did use information gleaned from the press in formulating its independent expenditure campaign, but no evidence has been uncovered of an actual agreement with the Reagan campaign to use the media for communication.

Evidence of direct contacts between NCPAC and the Reagan committees includes one long distance telephone call to the Utah headquarters, the Reagan for President Committee, the maker and recipient of which have not been identified, and the sale of a typewriter by NCPAC to the Reagan for President Committee in 1980, a transaction which does not appear to have facilitated other contacts regarding campaign strategy. Mr. Dolan has acknowledged actual or possible conversations in 1980 with certain persons involved in the Reagan campaign, namely, Anthony Dolan, Paul Russo, Roger Stone, and Charles Black, but has stated that these conversations would have been social in nature and not related to the Presidential campaign.

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Cooperation resulting from the use of certain common vendors does not appear likely given the nature or contents of the products or services obtained. In four instances, however, those involving the common employment of Arthur J. Finkelstein and Associates, of MediAmerica, of Ed Nichols and Associates, and of Diversified Mailing Services, Inc., the situation is, to varying degrees, different. NCPAC's employment of Finkelstein took place directly on the heels of that firm's employment by the Reagan for President Committee, and the work undertaken by Finkelstein for both campaigns included active involvement by the vendor in the activities of its clients, both as a pollster and, more importantly, as a campaign consultant. As stated above, this Office finds that these facts clearly point to the type of potential for cooperation and coordination addressed by 11 C.F.R. § 109.1(b)(4)(i)(B). NCPAC has asserted in NCPAC reports and in more recent statements that the Finkelstein involvement with that committee was related to its state and Congressional activities. Additionally, Mr. Dolan and Mr. Finkelstein have denied that there was any cooperation or coordination with the Reagan campaign. As mentioned, this Office does not believe that the bare assertions of these individuals completely outweigh the evidence of the active involvement of Mr. Finkelstein with both NCPAC and the Reagan for President Committee during the early primary campaign period.

The employment of MediAmerica by NCPAC at the same time or after this firm performed services for a Reagan committee also

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poses questions as to possible coordination given the active and creative role played by Richard Geske of MediAmerica in NCPAC's media efforts in support of the Reagan candidacy and his firm's perhaps less creative but still active role in telephone polling for the Reagan for President Committee. As noted, Mr. Dolan has denied that NCPAC's involvement with MediAmerica provided his committee with information about that company's work for Reagan. Yet MediAmerica's dual involvement provided a clear opportunity for coordination.

Richard A. Viguerie of Diversified Mailing Services also played an active, creative role in NCPAC's pro-Reagan campaign as did Ed Nichols in the activities of the Reagan for President Committee. On the other hand, the apparently passive nature of the work performed by Ed Nichols Associates for NCPAC and by Diversified Mailing Services for the Reagan campaign would appear not to have created the type of opportunity for coordination present in the cases of MediAmerica and Arthur J. Finkelstein and Associates.

All told, several issues involving vendors and a telephone call are still open as a result of this Office's extensive investigation of the relationship between NCPAC and the authorized Reagan committees during the 1980 primary and general election campaigns. It is highly doubtful that further investigation would be fruitful, either as regards the particular questions cited above or with regard to new lines of evidence.

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Representatives of both NCPAC and the Reagan committees have flatly denied that any coordination took place. They have also argued that there were committee policies designed to avoid either the reality or the appearance of such cooperation. On the other hand, opportunities for consultation and coordination certainly existed, both through the use of common vendors and through the personal relationships between representatives of the two committees. Whether or not advantage was taken of the opportunities remains in question.

Therefore, the Office of General Counsel recommends that the Commission take no further action with regard to the alleged violation by NCPAC of 2 U.S.C. § 441a(a).

C. Alleged Violation of 2 U.S.C. § 432(e)(4)

2 U.S.C. § 432(e)(4) states in part, "In the case of any political committee which is not an authorized committee, such political committee shall not include the name of any candidate in its name." The complainants in this matter alleged that NCPAC had violated Section 432(e)(4) in that its "project", "The Ronald Reagan Victory Fund" ("the Fund") is a "discrete, unauthorized political committee which (has) included the name Reagan in (its) name."

This Office has determined that because the language of both 2 U.S.C. § 432(e)(4) and the Commission's implementing regulation, 11 C.F.R. § 102.14(a), refers only to the names of political committees, it would be difficult to sustain the

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inference that it also applies to the use by such committees of a candidate's name in other contexts. Therefore, in order to find that 2 U.S.C. § 432(e)(4) was violated, it would be necessary to determine that "The Ronald Reagan Victory Fund" met the definition of a "political committee" at the time this name was used.

The investigation of the Fund has revealed that this "project" was not a political committee as that term is defined. It did not maintain either a separate bank account, or a bookkeeping system, separate personnel or the like. In his answers to the Commission's interrogatories on this issue, NCPAC's chairman asserted that "The Ronald Reagan Victory Fund" did not "maintain a bank account separate and apart from NCPAC although NCPAC does maintain a separate internal ledger accounting for receipts and expenditures on behalf of the Fund"; that "the Ronald Reagan Victory Fund does not employ a staff separate and apart from that of NCPAC"; that "most solicitations or requests for contributions" asked that checks be made payable to the Fund", while some asked that checks be written to NCPAC; that monies received from checks received by NCPAC which were made payable to NCPAC have been used by the Fund; that "contributions to NCPAC or to the Fund are deposited in the name of NCPAC and all such funds are commingled with the funds of NCPAC; and that all contributions to NCPAC or to the Fund are reported to the Commission by NCPAC as having been received by NCPAC." (Exhibit B).

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The NCPAC chairman testified that the project, "Ronald Reagan Victory Fund", was principally the responsibility of himself, Lisa Stoltenberg, Carl Channell and Richard Viguerie, who did the purchasing, and David Keene, who, as noted above, was hired to organize this project and who was involved primarily in media-related activities. (Dolan Deposition, pages 16-29, 42). The Fund was the sole source of funds for independent expenditures made by NCPAC in support of Ronald Reagan. (Dolan Deposition, page 42).

It appears that there has existed no group of persons involved with the activities here at issue which can be designated "The Ronald Reagan Victory Fund". Only NCPAC staff, bank accounts and other records have allegedly been involved in the receipt and expenditure of funds undertaken under this name. Contributions to the project were reported as receipts by NCPAC. Given these facts, "The Ronald Reagan Victory Fund" does not meet the definition of "political committee" set forth at 2 U.S.C. § 431(4)(A), and thus the provisions of 2 U.S.C. § 432(e)(4) are not applicable to those terms. Therefore, this Office recommends that the Commission find no probable cause to believe that NCPAC has violated 2 U.S.C. § 432(e)(4).

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III. GENERAL COUNSEL'S RECOMMENDATIONS

1. Find probable cause to believe and take no further action with regard to the violation of 26 U.S.C. § 9012(f) by the National Conservative Political Action Committee.

2. Take no further action with regard to the alleged violation of 2 U.S.C. § 441a(a) by the National Conservative Political Action Committee.

3. Find no probable cause to believe that the National Conservative Political Action Committee violated 2 U.S.C. § 432(e)(4).

25 March 1983
Date

Charles N. Steele
General Counsel

Attachments - 15 Exhibits

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Exhibit A

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

SUBPOENA TO PRODUCE DOCUMENTS AND MATERIALS
AND ORDER TO ANSWER WRITTEN QUESTIONS

TO:

National Conservative Political Action Committee
1500 Wilson Boulevard, # 573
Arlington, Virginia 22209

RE: MUR 1252

At the instance of the Federal Election Commission, pursuant to 2 U.S.C. §§ 437d(a)(1) and (3), the National Conservative Political Action Committee is hereby ordered to produce for inspection and copying all documents and materials listed below that are in the possession or control of the National Conservative Political Action Committee or of its officers, agents, staff members, volunteers or employees. Production is to be made at the Office of General Counsel of the Federal Election Commission at 1325 K Street, N.W. Washington, D.C. on October 20, 1980, at 10:00 a.m. In addition, the National Conservative Political Action Committee is hereby ordered to submit responses in writing and under oath to the interrogatories propounded herein, to the Federal Election Commission within ten (10) days of its receipt of this order.

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As used in this subpoena, the terms listed below are defined as follows:

1. The term "documents and materials" shall mean the original, all copies, and drafts of writings of any kind, printed, audio, visual, or electronic materials including but not limited to correspondence, memoranda, reports, transcripts, minutes, pamphlets, leaflets, notes, letters, lists, telexes, telegrams, messages (including reports, notes, memoranda and any other documentation of telephone conversations and conferences), calendar and diary entries, contracts, data, agendas, articles, visual aides, computer print-outs, account statements, billing forms, receipts, checks and other negotiable paper, solicitation materials, records and compilations in the possession, custody or control of the National Conservative Political Action Committee and the Ronald Reagan Victory Fund. Designated "documents and materials" are to be taken as including all attachments, enclosures and other documents that are attached to, relate to, or refer to such designated "documents and materials."

2. "Identify" with respect to individuals shall mean to give the full name, last known residence address of such individual, the last known place of business where such individual is or was employed, the title of the job or position held with the entity in question, and the dates of such service.

3. "National Conservative Political Action Committee" or "NCPAC" shall mean its predecessors, affiliates, committees, subcommittees; divisions, branches, projects, as well as any other bodies which conduct business on behalf of NCPAC, and NCPAC's officers, agents, employees, staff, and volunteers.

4. "Ronald Reagan Victory Fund" shall mean what NCPAC has described as a "project" of NCPAC.

5. Reagan General Election Committee shall mean the principal campaign committee (see 2 U.S.C. § 431(5)) of Ronald Reagan, the 1980 Republican nominee for the office of President, the committee's predecessors (including, but not limited to the Reagan for President Committee), affiliates, committees, subcommittees, divisions, branches, projects, as well as any other bodies which conduct business on its behalf, and its officers, agents, employees, staff and volunteers.

6. All references to the "FEC" shall mean the Federal Election Commission, its auditors, attorneys, and other employees.

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7. "FEC Disclosure Reports" shall mean any reports filed by NCPAC with the FEC pursuant to the requirements of 2 U.S.C. §§ 431-455.

8. "Agent" shall mean any person who has actual, oral or written authority, either express or implied, to make or to authorize the making of expenditures on behalf of a candidate; or any person who has been placed in a position within the campaign organization where it could reasonably appear that in the ordinary course of campaign-related activities he or she may authorize expenditures. See 11 C.F.R. § 109.1(b)(5).

9. "Organizer" with reference to a project or group, shall mean any person who has directly or indirectly participated in the formation, planning, structure or organization of the project or group in question, including, but not limited to, attendance at or participation in any meetings, discussions or communications concerning the project or group from the period from January 1980 to the group or project's formal inception.

10. The term "concerning" with reference to a subject or object shall mean mentioning, discussing, or directly or indirectly regarding, referring, or relating in any way to that subject or object.

If any document called for herein is withheld under a claim of privilege or objection, please furnish a list identifying each such document for which the privilege or objection is claimed, together with the following information:

(a) a description of the subject matter;
(b) the date of the document;
(c) the name and title of the author;
(d) the name and title of the person to whom the document was addressed;
(e) the name and title of the person to whom the document was actually sent;
(f) the identity of any other person who read all or part of the document;
(g) the number of pages;
(h) the paragraph of this subpoena to which the document is otherwise responsive, and
(i) the nature of the claimed privilege or objection.

Please produce in their entirety the following:

1. All documents and materials concerning meetings, discussions, correspondence, or other communications between NCPAC and/or the Ronald Reagan Victory Fund and any of the of the following persons

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or organizations or their officials, employees, staff members, volunteers, organizers, or agents which relate in any way to the efforts of either NCPAC and/or the Ronald Reagan Victory Fund or the below listed organizations or individuals with respect to Ronald Reagan's nomination as the Republican candidate for President or Ronald Reagan's general election campaign for President in 1980:

Reagan for President Committee
Reagan-Bush Committee
Reagan for President Compliance Fund
Republican National Committee
Reagan General Election Committee
1980 Republican Presidential Unity Committee
Ruth Jones, Ltd.
Bailey, Deardourff & Associates, Inc.
North Carolina Congressional Club
Americans for Reagan
Fund for a Conservative Majority
Citizens for Reagan in '80
Americans for Change
Reagan for President in '80
Americans for an Effective Presidency
Anna Chennault
Stuart Spencer
Senator Jesse Helms
James Lake

2. All documents and materials concerning or relating to the formation, organization, planning, or undertaking of the Ronald Reagan Victory Fund.

3. All documents and materials concerning or reflecting any NCPAC or Ronald Reagan Victory Fund decisions to expend funds which would in any way further the election of Ronald Reagan as the Presidential nominee of the Republican Party, or his general election for President in 1980 or which would aid in the defeat of any other 1980 Presidential candidate.

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Political Action Committee

concerning the following expendi-

sclosure reports:

	Reported Purpose
June 13, and June	Printing; Ronald Reagan U.S. President
, 1980	Printing; Ronald Reagan U.S. President

each item printed for use by NCPAC

above listed payments.

8

7

concerning the NCPAC expenditure on

N and Associates, the purpose

response of July 22, 1980, to

se.

4

0

sults, poll, memoranda, or report

Arthur Finkelstein and Associates,

ection with the above expenditure.

relating to the contractual or other association from January 1980, the Ronald Reagan Victory Fund and ents, officers or employees under- on the part of NCPAC and/or

the Ronald Reagan Victory Fund which would relate in any way to furtherance of the election of Ronald Reagan as the Presidential nominee of the Republican Party, or Ronald Reagan's general election for President in 1980 or which would aid in the defeat of any other 1980 Presidential candidate:

Diversified Direct, Inc.
Tri State Envelope Corp.
Arthur Finkelstein and Associates

7. All documents and materials relating to any NCPAC and/or Ronald Reagan Victory Fund expenditure of funds for the financing of the dissemination, distribution, or republication, in whole or in part, of any broadcast or any written, graphic or other form of campaign materials prepared by Ronald Reagan, the Reagan for President Committee, the Reagan General Election Committee, the Reagan Bush Committee, the Reagan for President Compliance Fund, the 1980 Republican Presidential Unity Committee, or the Republican National Committee.

8. All documents and materials disseminated, distributed or republished by NCPAC and/or the Ronald Reagan Victory Fund which contain, in whole or in part, any broadcast or any written, graphic or other form of campaign materials prepared or used by Ronald Reagan, the

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Reagan for President Committee, the Reagan General Election Committee, the Reagan-Bush Committee, the Reagan for President Compliance Fund, the 1980 Republican Presidential Unity Committee, or the Republican National Committee.

9. All documents and materials concerning any solicitation of or request for funds for the Ronald Reagan Victory Fund or by NCPAC which relate in any way to the furtherance of the election of Ronald Reagan as the Presidential nominee of the Republican Party, or the general election of Ronald Reagan as President in 1980 or which would aid in the defeat of any other 1980 Presidential candidate.

10. All telephone bills and/or other records of telephone calls made or received by NCPAC and the Ronald Reagan Victory Fund from January, 1980 to the present.

11. All documents and materials concerning a debt of $2,200 listed in Reagan for President Committee FEC disclosure reports as owed to NCPAC since February 22, 1980, for "office equipment" and all documents and materials concerning the receipt of $2,200 listed in the NCPAC FEC disclosure reports as coming from Reagan for President Committee on July 15, 1980, for a "memory typewriter".

8304207

Please answer the following interrogatories:

A. Describe the relationship between the Ronald Reagan Victory Fund and NCPAC, noting specifically:

(1) whether the Ronald Reagan Victory Fund maintains bank accounts or an accounting of receipts and expenditures separate and apart from NCPAC;

(2) whether the Ronald Reagan Victory Fund employs a staff separate and apart from that of NCPAC;

(3) whether solicitations or requests for contributions to the Ronald Reagan Victory Fund request that checks be made payable to NCPAC or to the Ronald Reagan Victory Fund or to either NCPAC or the Ronald Reagan Victory Fund;

(4) whether monies received from checks from NCPAC which were made payable to NCPAC have been used by the the Ronald Reagan Victory Fund, and

(5) in whose name the account is held into which funds contributed to or for the Ronald Reagan Victory Fund are deposited.

B. Please identify all officers, directors, employees, staff members, media time buyers, volunteers, consultants or other agents of NCPAC and the Ronald Reagan Victory Fund from September 1979 to the present. With respect to each individual identified, please identify that person's supervisor. 1/

1/ In lieu of identifying the supervisor of each individual identified in response to interrrogatory B, NCPAC and the Ronald Reagan Victory Fund may each provide the Commission with organizational charts.

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(1) Please identify which of the above individuals and any other individuals who have, participated in any way, directly or indirectly, in the oral or written authorization (express or implied) of any NCPAC or Ronald Reagan Victory Fund expenditures which relate in any way to the election of Ronald Reagan as the Presidential nominee of the Republican Party, or his general election for President in 1980 or which would aid in the defeat of any other Presidential candidate in 1980.

(2) Please identify which of the above individuals and and other individuals who have participated in any way, directly or indirectly, in the production, conception, drafting, writing, editing, approval, review, presentation, printing, publication, distribution or dissemination of documents and materials produced by either NCPAC or the Ronald Reagan Victory Fund which relate in any way to the election of Ronald Reagan as the Presidential nominee of the Republican Party, or his general election for President in 1980 or which would aid in the defeat of any other 1980 presidential candidate.

(3) Please identify which of the above individuals and any other individuals have participated in any way, directly or indirectly in the planning, organization, and formation of the Ronald Reagan Victory Fund.

C. Please provide a list of all items (including, but not limited to, office equipment, machinery, furniture, and office supplies) transferred by NCPAC to the Reagan General Election Committee

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since January 1980, along with an item by item breakdown containing the original cost of each item paid by NCPAC, and the amount paid, if any, by the Reagan General Election Committee for each item.

D. List the phone numbers and extensions used by NCPAC and the Ronald Reagan Victory Fund since January 1980, noting the extensions assigned to or used by each person identified in response to interrogatory B.

E. List by date and location all fundraisers held by NCPAC and/or the Ronald Reagan Victory Fund since January, 1980 which related in any way to the election of Ronald Reagan as the Presidential nominee of the Republican Party, or his general election for President in 1980, or which in any way aided in the defeat of any other 1980 Presidential candidate.

F. With respect to each individual identified in response to interogatory B, please note whether that individual has had any past, or has any present association, either by way of employment, position, or membership, with any of the below listed organizations, projects, or companies. With respect to each such association, note the dates during which each such person was so associated with the particular group, organization, project, or company and the position(s) held with each.

Americans for Change
Reagan for President in '80
Americans for an Effective Presidency
Fund for a Conservative Majority
Citizens for Reagan in '80
The Republican Party
The Reagan for President Committee
Group '80
1980 Republican Presidential Unity Committee
Citizens for the Republic

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Richard A. Viguerie Co., Inc.
Arthur J. Finkelstein & Associates
Ruth Jones, Ltd.
Bruce Eberle Associates, Inc.
Decision Making Information, Inc.
Bailey, Deardourff & Associates, Inc.
Citizens for the Republic
North Carolina Congressional Club
Americans for Reagan
National Conservative Political Action Committee
The Ronald Reagan Victory Fund
Committee for Independent Expenditures for Republicans
Target 80
The Conservative Coalition
The Conservative Caucus
Reagan 80
1980 United Republican Committee
Committment 80

WHEREFORE, the Vice Chairman of the Federal Election Commission has hereunto set his hand at the offices of the Commission at 1325 K Street, N.W., Washington, D.C., this 29th day of September 1980.

John W. McGarry
Vice Chairman

ATTEST:

Marjorie W. Emmons
Secretary to the Commission

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Exhibit B

BEFORE THE FEDERAL ELECTION COMMISSION

CARTER-MONDALE REELECTION COMMITTEE, INC., et al., Complainants, -against- RONALD REAGAN, et al., Defendants.	MUR 1252

ANSWERS TO INTERROGATORIES

COMES NOW, National Conservative Political Action Committee (NCPAC); by its Chairman, John T. Dolan, and in response to the written Interrogatories from the Federal Election Commission to NCPAC in this matter, answers as follows:

A. NCPAC is a multi-candidate political committee one of whose objects is to further the election of Ronald Reagan to the office of President of the United States. NCPAC pursues this object through the "Ronald Reagan Victory Fund, a project of National Conservative Political Action Committee." The Ronald Reagan Victory Fund is not a separate entity, but is a project of NCPAC.

With regard to the specific questions raised by the Commission concerning the relationship of NCPAC to the Ronald Reagan Victory Fund ("the Fund"):

1.) The Fund does not maintain a bank account separate and apart from NCPAC, although NCPAC does maintain a separate internal ledger accounting for receipts and expenditures on behalf of the Fund.

2.) The Fund does not employ a staff separate and apart from that of NCPAC.

3.) Most of the solicitations or requests for contributions to the Fund ask that checks be made payable to the Fund. Some solicitations have requested that contributions be made to NCPAC.

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4.) Monies received from checks received by NCPAC which were made payable to NCPAC have been used by the Fund. All contributions to NCPAC or to the Fund are reported to the Commission by NCPAC as having been received by NCPAC.

5.) The account into which funds contributed to or for the Fund are deposited is in the name of NCPAC and all such funds are commingled with the funds of NCPAC.

B. NCPAC objects to this question as being unreasonable and overbroad in that it requests information beyond the scope of the Commission's findings of reason to believe that NCPAC has violated statutes or regulations over which the Commission has jurisdiction. Moreover, to supply the information requested would require that NCPAC conduct a systematic search of all of its records, and to do so within the time period afforded by the Commission would unduly burden NCPAC and its personnel.

C. NCPAC has not transferred any items of the type listed in this Interrogatory to the Reagan General Election Committee since January, 1980. In September, 1979, NCPAC transferred certain typewriters to that Committee in consideration of the payment by that Committee of $2,200.00, which amount was paid in full by the Committee to NCPAC on or about July 15, 1980.

D. See response to Interrogatory B.

E. See response to Interrogatory B.

F. See response to Interrogatory B.

STATE OF VIRGINIA)
COUNTY OF ARLINGTON) SS:

The undersigned, being first duly sworn, on oath deposes and says that he has read the above and foregoing Answers to Interrogatories by him subscribed, knows the contents thereof, and that the answers therein set forth are true.

JOHN T. DOLAN

SUBSCRIBED and sworn to before me this 14th day of October, 1980.

Notary Public

My commission expires: 2/6/84

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Exhibit C
GCC#4714

81 MAY 19 AM 7:57

SEDAM & HERGE
A PROFESSIONAL CORPORATION
ATTORNEYS AT LAW
7600 OLD SPRINGHOUSE ROAD
McLEAN, VIRGINIA 22102

(703) 821-1000

GLENN J. SEDAM, JR.
J. CURTIS HERGE

ROBERT R. SPARKS, JR.
MICHAEL D. HUGHES
A. MARK CHRISTOPHER
KAREN LUBSEN BLAIR
JOHN ROBERT CLARK III

1700 PENNSYLVANIA AVENUE, N.W.
WASHINGTON, D.C. 20006
(202) 393-7124

TWX/TELEX 710-831-0696
CABLE: SEDANHERGE

May 18, 1981

RECEIVED
FEDERAL ELECTION COMMISSION
GENERAL COUNSEL

81 MAY 19 P1:49

Ms. Anne A. Weissenborn
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: MUR 1252

Dear Ms. Weissenborn:

I enclose NCPAC's responses to Commission Interrogatories B and B(1)-B(3). You will recall that on October 14, 1980, I submitted to you NCPAC's responses to Commission Interrogatories A and C in this matter. I will forward to you additional documents and information requested by the Commission as those items are produced by NCPAC. NCPAC is currently searching its records in an effort to produce the requested information.

Sincerely,

Robert R. Sparks, Jr.

Robert R. Sparks, Jr.

enclosure

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81 MAY 19 AM 7:57

SEDAM & HERGE

81 MAY 19 AM 7:57

INTERROGATORY B

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FEC - 11

GENERAL COUNSEL

81 MAY 19 P1:51

Name & Address	Position Held at NCPAC	Date of Employment	Last Known Employer	Supervisor
Karen Adams 1707 South 26th Street Arlington, VA	Caller	9/80 - 5/81	NCPAC	J. Lopretto
James Altman 5340 North 37th St. Arlington, VA 22207	Caller	2/80 - 2/81	NCPAC	J. Lopretto
John Andruknois 6036 North 25th Street Arlington, VA	Caller	6/80 Present	NCPAC	J. Lopretto
Mary Andrukonis 6036 North 25th Street Arlington, VA 22207	Caller	1978 Present	NCPAC	J. Lopretto
Barbara Augustus 1500 Massachusetts #322 Washington, DC	Caller	9/80- 1/81	NCPAC	J. Lopretto
Sandra Augustus 1500 Massachusetts #322 Washington, DC	Caller	8/80 - 12/80	NCPAC	J. Lopretto
Elizabeth Aquino 1121 Arlington Blvd. Arlington, VA	Caller	1/80 - 6/80	NCPAC	J. Lopretto
Margaret Baker 7026 Round Tree Rd. Falls Church, VA	Caller	10/79 - Present	NCPAC	J. Lopretto
Stacy Ballin 147 Seth Low Mtn.Rd. Ridgefield, CT 06877	Caller	6/80 - 10/80	NCPAC	J. Lopretto
Gloria Balthrop 1717 R Street, NW #101 Washington, DC	Caller	10/80 - 3/81	NCPAC	J. Lopretto
Mary Bilian 18901 Devonshire Burmingham, MC 48009	Convention Worker	7/80 - 7/80	NCPAC	L. Stoltenberg
Norma P. Bell 1523 No. 16th Rd, #3 Arlington, VA 22209	Caller	12/79 - 12/79	NCPAC	J. Lopretto
Randall Bergen 5601 Seminary Rd. #2114-N Falls Church, VA 22041	Caller	12/79 - 9/81	NCPAC	J. Lopretto
Albert Biddle III 501 Haven Lane Great Falls, VA 22066	Caller	5/80 - 9/80	NCPAC	J. Lopretto
Brent Bozell 317 Rock Springs Rd Warrenton, VA	Fundraiser	5/80 - Present	NCPAC	C. Channell

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Name & Address	Position Held at NCPAC	Date of Employment	Supervisor
Susanne Buchanan 1823 North 14th Street Arlington, VA	Caller	1978 - Present	NCPAC	J. Lopretto
Pamela Bynum 4660 Martin Luther King Ave, SW #A903 Washington, DC	Caller	9/80 - 12/80	NCPAC	J. Lopretto
W. R. Campbell 1344 G Street, SE Washington, DC	Fundraiser	6/80 - Present	NCPAC	C. Channell
Beatrice Cothran 4430 - 14th Street, NE Washington, DC	Caller	3/80 - Present	NCPAC	J. Lopretto
Celeste Cruz 1701 Massachusetts Ave,NW Washington, DC	Caller	6/80 - Present	NCPAC	J. Lopretto
Laura Cruz 1701 Mass. Ave, NW Washington, DC	Caller	9/80 - 10/80	NCPAC	J. Lopretto
Donna L. Daly College Park, MD	Caller	1978 - 9/80	NCPAC	J. Lopretto
Frederick S. Daly 8610 - 34th Avenue College Park, MD	Caller	1978 - Present	NCPAC	J. Lopretto
Anthony Dailey 425 Edgewood St, NE C-8 Washington, DC	Caller	8/80 - 10/80	NCPAC	J. Lopretto
June Dempsey 3067 Brinkley Rd. Temple Hills, MD	Caller	9/80 - Present	NCPAC	J. Lopretto
Anne Dohrs 2916 Olive Street, NW Washington, DC	Coordinator	6/80 - Present	NCPAC	J. Dolan
John T. Dolan 3129 South 14th St. Arlington, VA	National Chairman		NCPAC	N/A
Lois Doyle 1011 Arlington Blvd 704W Arlington, VA	Caller	1978 - Present	NCPAC	J. Lopretto
Christine Estes 1833 N.Hampshire Ave,NW Apt #104 Washington, DC	Caller	1978 - 12/80	NCPAC	J. Lopretto
Tristin Evans 800 N. Wayne Street	Asst.Supervisor	11/79 - Present	NCPAC	J. Lopretto

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Richard M. Pasroll 3412 "P" Street, NW Washington, DC	Caller	6/80 - 9/80	NCPAC	J. Lopretto
Terry S. Feaganes 2603 Fairhaven Avenue Alexandria, VA	Clerk	1978 - Present	NCPAC	J. Lopretto
Jacqueline Fox 5863 Monticello Rd. Alexandria, VA	Clerk	1978 - Present	NCPAC	J. Lopretto
Michael Freeman 1309 North Ode St #502 Arlington, VA	Caller	10/79 - 9/80	NCPAC	J. Lopretto
Scott Gardner 1602 Elson St. W. Hyattsville, MD	Caller	12/80 - 12/80	NCPAC	J. Lopretto
Brian M. Goray Box 401 Rt. #4 Chaple Hill, NC	Convention Worker	7/80 - 7/80	NCPAC	L. Stoltenberg
Eleanor Hannegan 9378 Tartan View Dr. Fairfax, VA	Head Bookkeeper	4/80 - Present	NCPAC	C. Taw
Susan S. Hannegan 6519 Newington Rd. Lorton, VA	Head Bookkeeper (Former Treasurer)	4/80 - 2/81	NCPAC	C. Taw
Edna Healey 4928 S. 14th Street Arlington, VA	Administrative Assistant	1/80 - Present	NCPAC	C. Channell
Toni Ingram 1627 N. Abingdon St. Arlington, VA	Caller	10/79 - 12/80	NCPAC	J. Lopretto
Richard Jones Box 3-374, Bldg 403 Ft. Myer, VA	Caller	1/80 - 12/80	NCPAC	J. Lopretto
Susan Kardaras 4719 Southland Avenue Alexandria, VA	Caller	12/79 - Present	NCPAC	J. Lopretto
Thomas Kardaras 4719 Southland Avenue Alexandria, VA	Caller	12/79 - Present	NCPAC	J. Lopretto
Joanne Kay 915 Crittenden, NW Washington, DC	Caller	8/80 - 12/80	NCPAC	J. Lopretto
Daniel Curt Kerekes 1315 NW "T" Street Washington, DC	Caller	9/80 - 10/80	NCPAC	J. Lopretto

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Benjamin Kinard 3430 25th Avenue Hillcrest Heights, MD	Caller	11/80 Present	NCPAC	J. Lopretto
Tracey Kirksey 4309 East 131st Street Cleveland, OH	Caller	9/80 - Present	NCPAC	J. Lopretto
Christopher Kraut 6015 Crater Place Alexandria, VA	Caller	2/79 - Present	NCPAC	J. Lopretto
Christine Kraut 6015 Crater Place Alexandria, VA	Caller	1978 Present	NCPAC	J. Lopretto
Catherine Evans 800 N. Wayne St. #302 Arlington, VA	Caller	11/80 - Present	NCPAC	J. Lopretto
Velma Lane 1700 Jasmine Terract #19-208 Hyattsville, MD	Caller	9/80 - 10/80	NCPAC	J. Lopretto
Tommy Lee 1121 24th Street, NW Washington, DC	Caller	11/80 - Present	NCPAC	J. Lopretto
David Lopretto 4327 Ravensworth Rd #618 Annandale, VA	Caller	9/79 - Present	NCPAC	J. Lopretto
Jaquelene Lopretto 4327 Ravensworth Rd. #618 Annandale, VA	Supervisor Phone Bank	1978 - Present	NCPAC	J. Dolan
Stuart MacLean 126 North Brookside Dr. Arlington, VA	Researcher	9/80 - 11/80	NCPAC	L. Stoltenberg
Gary Maloney 1111 Arlington Blvd. #429 Arlington, VA	Researcher	9/80 - 11/80	NCPAC	L. Stoltenberg
John Marr 2201 L Street, NW #810 Washington, DC	Assistant Supervisor	6/80 - Present	NCPAC	J. Lopretto
Kim McCaldon 1143 N. Frederick Street Arlington, VA	Caller	8/79 - 4/81	NCPAC	J. Lopretto
Maria McCarthy 1660-B Beckman Pl., NW Washington, DC	Caller	12/80 - 4/81	NCPAC	J. Lopretto

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Mary McIntire 5550 North Morgan St. Alexandria, VA	Secretary	2/80 - 12/80	NCPAC	C. Channell
Chreyl Melvin 162 Todd Place, NE Washington, DC	Caller	8/80 - 10/80	NCPAC	J. Lopretto
Nancy Meyer 5000 South 14th Street Arlington, VA	Secretary	8/80 - 3/81	NCPAC	L. Stoltenberg
Wanda Mickett 7259 Jennings St. Woodbridge, VA	Caller	9/80 - 1/81	NCPAC	J. Lopretto
Donald Parschalk 8631 Village Way Alexandria, VA	Caller	8/80 - Present	NCPAC	J. Lopretto
Licille Phillips 1278 Delafield Place, NE Washington, DC	Clerk	2/80 - Present	NCPAC	J. Lopretto
Paula Phillips 1278 Delafield, Pl., NE Washington, DC	Clerk	2/80 - 12/80	NCPAC	J. Lopretto
Tammy Phillips 1278 Delafield Place, NE Washington, DC	Clerk	1/80 - 10/80	NCPAC	J. Lopretto
Manolito Ramirez 8515 Grubb Road Silver Springs, MD	Caller	7/80 - 10/80	NCPAC	J. Lopretto
Leigh Ramsay 2116 N. Key Blvd. #938 Arlington, VA	Caller	9/80 - 10/80	NCPAC	J. Lopretto
Roger Reed Route 1, Box 8 Hayti, Missouri	Researcher	5/80 - 10/80	NCPAC	L. Stoltenberg
Brenda Riggins 2108 Country Road #1 District Heights, MD	Caller	9/80 - 10/80	NCPAC	J. Lopretto
Betty Lou Roan 7800 Tayloe Drive, #70 Manassas, VA	Caller	7/79 - 12/79	NCPAC	J. Lopretto
Scott Robinson 2608 South Grant Street Arlington, VA	Caller	11/79 - 12/79	NCPAC	J. Lopretto
Paula Scaringi 2725 - 39th St., NW #406 Washington, DC	Caller	7/79 - 8/80	NCPAC	J. Lopretto

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Amy Eshleman 214 North Alfred Alexandria, VA	Receptionist	3/81 - Present	NCPAC	C. Taw
Judith Gorny 1802 Wilson Lane #203 McLean, VA	Secretary	12/80 - Present	NCPAC	C. Channell
Karen Grant 7905 Dassett Court #301 Annandale, VA	Assistant Bookkeeper	3/81 - 5/81	NCPAC	C. Taw
Leif Noren 7717 Donnybrook Ct. #201 Annandale, VA	Assistant To Office Mgr.	1/81 - Present	NCPAC	C. Taw
Knut Rostad 13925 Esworthy Road Germantown, MD	Researcher	1/81 - Present	NCPAC	L. Stoltenberg
Mary Adams 818 North Jackson St. Arlington, VA	Caller	9/79 - 7/80	NCPAC	J. Lopretto
Maria Amas 6950 North 28th St. Arlington, VA	Caller	8/79 - 1/80	NCPAC	J. Lopretto
Linda Andrukonis 6036 N. 25th Street Arlington, VA	Caller	7/80 - 8/80	NCPAC	J. Lopretto
Daniel C. Beck 7481 Lee Highway #815 Falls Church, VA	Caller	2/80 - 3/80	NCPAC	J. Lopretto
Mary Bilian 18910 Davonshire Burmingham, Michigan	Convention Worker	7/80 - 7/80	NCPAC	L. Stoltenberg
Robin Bolden 8121 Manson Street Landover, MC	Receptionist	4/80 - 7/80	NCPAC	C. Taw
Bruce Bombere 723 N. Ivy Arlington, VA	Caller	1/80 - 2/80	NCPAC	J. Lopretto
Becki Burlingame 2729 Gallows Rd. #301 Vienna, VA	Head Bookkeeper	1978 - 3/80	NCPAC	J. Dolan
Peter Corrigan 106 South Lexington St Arlington, VA	Caller	4/80 - 5/80	NCPAC	J. Lopretto
Jeanne Dodge 7815 Falstaff Rd.	Receptionist	1/80 - 4/80	NCPAC	L. Stoltenberg

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Martha Duncan 1762 Preston Rd. Alexandria, VA	Office Manager	3/80 - 4/80	NCPAC	J. Dolan
Lillian Faulkner 1500 North 16th Rd. #2A Arlington, VA	Caller	1/80 - 9/80	NCPAC	J. Lopretto
Mark Florio 701 Marshall Rd., SW Vienna, VA	Researcher	11/79 - 1/80	CALL	J. Dolan
Debra Fox 58363 Monticello Rd. Alexandria, VA	Caller	2/80 - 4/80	NCPAC	J. Lopretto
Donna Goray 18731 Glenwood Lathrup Village, MI	Convention Worker	7/80 - 7/80	NCPAC	L. Stoltenberg
Harry Hannah 5113 Scarsdale Rd. Bethesda, MD	Intern	6/80 - 8/80	NCPAC	L. Stoltenberg
Winnifred Henley 152 Birch St. #C-1 Falls Church, VA	Caller	8/79 - 1/80	NCPAC	J. Lopretto
Joseph Jackson 606 Acker St. Basm't. Washington, DC	Caller	6/80 - 6/80	NCPAC	J. Lopretto
Robert Jewett 6206 - 12th Rd. Arlington, VA	Caller	1/79 - 1/80	NCPAC	J. Lopretto
Samuel Jones, Jr. 501 Slaters Lane Alexandria, VA	Caller	12/80 - 1/81	NCPAC	J. Lopretto
Sheila Lewis 5142 Williamsburg Blvd. Arlington, Va	Caller	1/80 - 2/80	NCPAC	J. Lopretto
Leslie Lynch 1135 Belmont Avenue Wyomissing, PA	Caller	9/79 - 5/80	NCPAC	J. Lopretto
Silas Manuel 8229 Russell Rd. Alexandria, VA	Caller	6/80 - 8/80	NCPAC	J. Lopretto
Debbie Mitchell 6840 Stoneybrooke Lane Alexandria, VA	Caller	1/80 - 1/80	NCPAC	J. Lopretto
Georgie Mitchell 1515 South Jefferson Davis Highway Arlington, VA	Caller	6/80 - 7/80	NCPAC	J. Lopretto

8304120800

Elizabeth Waldvie 1020 - 19th St. NW Washington, DC	Caller	8/80 - 9/80	NCPAC	J. Lopretto
Rita Wittig 6800 Fleetwood Rd. McLean, VA	Caller	1978 - 3/80	NCPAC	J. Lopretto
Bryan Wirwicz 4112 South - 36th Street Arlington, VA	Fundraiser	1/80 - 5/80	NCPAC	C. Channell
Peter Asmar 318 South Whiting St., Apt N-14 Alexandria, VA	Head Bookkeeper	2/81 - 3/81	NCPAC	C. Taw
John Andrukonis 6036 N. 25th Street Arlington, VA	Caller	6/80 - Present	NCPAC	J. Lopretto
Garen Babajanian 800 North Wayne Arlington, VA	Caller	4/81 - Present	NCPAC	J. Lopretto
George Hawkins, Jr. 8903 Crandall Road Lanham, MD	Caller	2/81 - Present	NCPAC	J. Lopretto
Ronald Leighton 1506 North Scott St. #10 Arlington, VA	Caller	4/81 - Present	NCPAC	J. Lopretto
Maurice Marshall 6841 Riverdale Rd, #A202 Riverdale, MD	Caller	1/81 - Present	NCPAC	J. Lopretto
Theresa Nave 1615 South 28th Street #10 Arlington, VA	Caller	12/80 - Present	NCPAC	J. Lopretto
Amalia Noguera 4141 Henderson Rd. #514 Arlington, VA	Caller	4/81 - Present	NCPAC	J. Lopretto
Richard Paulson 806 South Orme Street Arlington, VA	Caller	2/81 - Present	NCPAC	J. Lopretto
Helaine Roberts 2251 Pimmit Drive Falls Church, VA	Caller	4/81 - Present	NCPAC	J. Lopretto
Valarie Schreck 1405 A North Van Dorn Alexandria, VA	Caller	5/81 - Present	NCPAC	J. Lopretto
Danita Audrey Selph 1617 South 28th Street, #6 Arlington, VA	Caller	4/81 - Present	NCPAC	J. Lopretto

8304120801

Christina Slaney 437 Argyle Drive Alexandria, VA	Caller	3/81 - Present	NCPAC	J. Lopretto
Richard Slaney 4501 Arlington Blvd. Apt #920 Arlington, VA	Caller	1/81 - Present	NCPAC	J. Lopretto
Kristina Sohail-Ahmed 8308 Tobin Road Annandale, VA	Caller	4/81 - Present	NCPAC	J. Lopretto
Patricia A. Swinson 4809 North 17th Street Arlington, VA	Caller	4/81 - Present	NCPAC	J. Lopretto
Robin Wagner 6525 Halleck Street District Heights, MD	Caller	4/81 - Present	NCPAC	J. Lopretto
Leigh Huff, Jr. 110 N. Masonic View Avenue Alexandria, VA	Intern	3/81 - 4/81	NCPAC	L. Stoltenberg
Calvin Amburgey 4920 Lombard Lane Dale City, VA	Caller	8/79 - 11/79	NCPAC	J. Lopretto
Susan Anderson 6443 King Louis Drive Alexandria, VA	Caller	3/79 - 12/79	NCPAC	J. Lopretto
Mary Carter 1301 15th Street, NW Washington, DC	Caller	10/79 - 10/79	NCPAC	J. Lopretto
Caroln Cason 3320 Curtis Drive #202 Hillcrest Heights, MD	Caller	1978 - 10/79	NCPAC	J. Lopretto
E. William Coombs Idylwood Towers W, #402 Falls Church, VA	Caller	1978 - 9/79	NCPAC	J. Lopretto
Aubrey H. Jones 1204 South Washington St. Alexandria, VA	Caller	1978 - 9/79	NCPAC	J. Lopretto
Josephine Lamont 1212 North Cleveland Street Arlington, VA	Caller	9/79 - 9/79	NCPAC	J. Lopretto
Robert Neet 1511 North Highland Arlington, VA	Caller	1978 - 9/79	NCPAC	J. Lopretto

8304120830

Phillip Pipkin 106 Morris Drive #303 Laurel, MD	Caller	12/79 - 12/79	NCPAC	J. Lopretto
Steven Richfield 1201 North Stuart Street Arlington, VA	Caller	7/79 - 9/79	NCPAC	J. Lopretto
Vivian Sadtler 425 E. Columbia Street Falls Church, VA	Caller	11/79 - 12/79	NCPAC	J. Lopretto
Diane Simmons 4203 Oglethorpe St. #103 Hyattsville, MD	Caller	8/79 - 9/79	NCPAC	J. Lopretto
Phyllis Tinsley 7252 #1 Fairchild Drive Alexandria, VA	Caller	10/79 - 10/79	NCPAC	J. Lopretto
J. Curtis Herge Sedham & Herge 7600 Old Springhouse Rd. McLean, VA	Secretary of Board of Directors		Sedham & Herge	N/A
Carl Channell 2032 Belmont Rd. Washington, DC	Consultant	1978 - Present	NCPAC	J. Dolan

8304020080

INTERROGATORY B(1)

John T. Dolan

Lisa Stoltenberg

Carl Channell

David Keene

Jimmie Walker

Richard Gueske

Stuart McLean

Candace Taw

8304042080

31 MAY 19 A11:58

INTERROGATORY B(2)

8304042080 5

Rhonda Stahlman CALL 5707 Seminary Rd. Suite 308 Bailey's Crossroads, VA	Executive Committee Member	N/A	CALL	N/A
Curt Clinkscales CLCo 101 Washington Court Falls Church, VA	Executive Committee Member	N/A	CLCo	N/A
Robert L. Shortley 310 North Pitt Alexandria, VA	Executive Committee Member	N/A		N/A
David Keene 10874 Hampton Rd. Fairfax Station, VA	Consultant	N/A		N/A
Richard Gueske %MediAmerica 1900 North Beauregard Alexandria, VA	MediaBuyer	N/A	MediAmerica	N/A
Jimmie Walker %Time & Space Media Services 5350 Poplar Avenue Suite 512, Box 7 Memphis, Tennessee	MediaBuyer	N/A		N/A

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INTERROGATORY B(1)

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INTERROGATORY B(3)

8304042080 8

INTERROGATORY B(3)

John T. Dolan

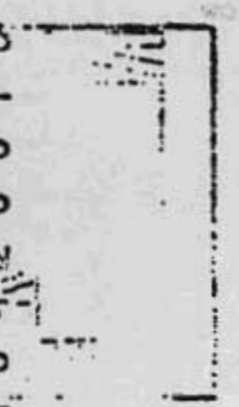
Lira Stoltenberg

David Keene

Carl Channell

8304042080

NCPAC National Conservative Political Action Committee
1500 wilson blvd. • arlington, va. • 22209



Paid for by NCPAC; not authorized by any candidate or candidate's committee.

does not let up his campaigning between now and

Here's why:

As I've said, most polls show Carter and Reagan neck and neck.

As you may know, once Carter and Reagan receive the Presidential nominations from their party, their campaigns are given about $21 million each from the Federal Government for the general election campaign.

They are not allowed to raise additional money from individuals or spend more than they are given.

If this is true then Reagan's got an even chance of being elected, right?

Wrong! Because as a sitting President Jimmy Carter will have tremendous advantages over any challenger no matter how low in the polls he may be.

For example:

1. Carter, as President, can literally "create" news. He can get invaluable network time any time he wants it through his action in office.

2. Also, although Federal employees are legally barred from politics you can be sure that Carter will have an army of appointed bureaucrats doing everything in their power to keep their boss in office.

3. Then there's the federal "pork barrell." Carter will be doling out dams, mass transit funds, military bases and you name it buying votes all over the country between now and election day.

4. Finally, there's Big Labor. Frankly, although many blue collar workers support Reagan, the Union Bosses are still committed heart and soul to the Democratic Party and Jimmy Carter. This means that tens of thousands of "Carter volunteers" (who are really on union payrolls) will be beating the bushes for Carter between now and November. Remember, the unions spent over $11 million in 1976 to help elect Carter.

None of the advantages I've just mentioned will count against the spending limit on Carter's campaign.

You can see that to get Reagan elected is going to take more than just the $21 million his campaign will get from the Government.

Like Carter, Reagan is also going to have to have out-

8304208011

side help.

In this case you and me.

Electing Reagan President is going to take everything you and I and every other dedicated conservative can put into it.

Frankly, I don't think we have much choice.

This country simply cannot take another four years of the bankrupt liberal philosophies of Jimmy Carter and his followers.

1980 is a decisive year for our nation.

NCPAC has never been involved in a Presidential campaign before. We have worked hard to elect hundreds of conservatives to Congress, the Senate, and state offices. If I may say so, we're pretty good at it, too.

In fact, in 1978 we won 71% of the elections we were involved in.

This year we hope to be even more successful. As you may know, for the first time in 20 years we have a chance to elect a Republican majority to the U.S. Senate. We only need to defeat 10 of the 24 Democrats up for re-election to take over the Senate.

I'm prepared to commit every shred of talent and resources NCPAC has to elect as many conservatives as possible and to elect Ronald Reagan President. But we can't do it alone.

Will you help me?

Remember, what we do today and in the next few weeks will have a tremendous impact on our nation's future.

That's why I'm asking you to send $1,000 at least to help us elect a conservative President and conservative majority in Congress.

Perhaps you can send more. Perhaps less. But whatever you can send, please don't hesitate. Send what you can immediately.

The pro-Reagan advertisements for radio and T.V. have already been produced. I've enclosed scripts from a couple of them for you to see. Some of the top conservative minds in campaign advertising worked on these ads.

Your $1,000 contribution today will help get

8304208

side help.

In this case you and me.

Electing Reagan president is going to take everything you and I and every other dedicated conservative can put into it.

Frankly, I don't think we have much choice.

This country simply cannot take another four years of the bankrupt liberal philosophies of Jimmy Carter and his followers.

1980 is a decisive year for our nation.

NCPAC has never been involved in a Presidential campaign before. We have worked hard to elect hundreds of conservatives to Congress, the Senate, and state offices. It may say so, we're pretty good at it, too.

In fact, in 1978 we won 71% of the elections we were involved in.

This year we hope to be even more successful. As you may know, for the first time in 30 years we have a chance to elect a Republican majority to the U.S. Senate. We only need to defeat 10 of the 14 Democrats up for re-election to take over the Senate.

I'm prepared to commit every friend of talent and resources NCPAC has to elect as many conservatives as possible and to elect Ronald Reagan President. But we can't do it alone.

Will you help me?

Remember, what we do today and in the next few weeks will have a tremendous impact on our nation's future.

That's why I'm asking you to send $1,000 at least to help us elect a conservative President and conservative majority in Congress.

Perhaps you can send more. Perhaps less. But whatever you can send, please don't hesitate. Send what you can immediately.

The pro-Reagan advertisements for radio and T.V. have already been produced. I've enclosed scripts from a couple of them for you to see. Some of the top conservative minds in campaign advertising worked on these ads.

Your $1,000 contribution today will help get

8304042081 3

Exhibit B

Urgentgram

URG

From:

To:

8.3.0.4.0.4.2.0.8.1.4

L20H

Authorized and paid for by the National Conservative Political Action Committee

ADVANTAGE AS A SITTING PRESIDENT.

CARTER CAN GET INSTANT PUBLICITY AND ADVERTISING WHENEVER HE WANTS IT JUST BY CALLING A PRESS CONFERENCE.

ALSO, CARTER CAN "BUY VOTES" BY PROMISING FEDERAL MONEY, DAMS, ETC. TO DIFFERENT COMMUNITIES BEFORE THE ELECTION.

ON TOP OF THIS, HE WILL HAVE AN ARMY OF GOVERNMENT PAID BUREAUCRATS WORKING FOR HIS RE-ELECTION.

FINALLY, YOU CAN BET BIG LABOR WILL BE DOING EVERYTHING IN ITS POWER TO HELP CARTER AND STOP REAGAN (THEY SPENT OVER $11 MILLION TO HELP CARTER IN 1976).

NONE OF THESE ADVANTAGES WILL BE COUNTED AGAINST THE SPENDING LIMIT ON CARTER'S CAMPAIGN.

BUT NCPAC WITH YOUR HELP WILL RUN "INDEPENDENT" PRO--REAGAN ADS TO HELP OFFSET CARTER'S HUGE ADVANTAGES. THIS KIND OF HELP COULD MAKE THE DIFFERENCE IN THE NOVEMBER ELECTION. BUT WE MUST MOVE QUICKLY.

I AM CONVINCED RONALD REAGAN IS A DEDICATED CONSERVATIVE WHO WILL HELP TURN THIS COUNTRY AROUND IF ELECTED. BUT, ASIDE FROM THIS, I AM DETERMINED TO HELP GOVERNOR REAGAN NOW FOR TWO REASONS:

1. WHEN NCPAC WAS FOUNDED IN 1976 RONALD REAGAN SIGNED A LETTER PERSONALLY ASKING HIS SUPPORTERS AND OTHER CONSERVATIVES ALL OVER THE COUNTRY TO HELP US. IN FACT NCPAC WAS THE ONLY ORGANIZATION RONALD REAGAN HELPED IN 1976.

   MANY THOUSANDS OF CONSERVATIVES RESPONDED TO HIS CALL. HE IS ONE OF THE MAIN REASONS NCPAC IS HERE TODAY WITH A 71% WIN RECORD AGAINST THE LIBERALS.

2. AN OVERWHELMING MAJORITY OF CONSERVATIVES -- PERHAPS YOU WERE ONE--WHO WERE CONTACTED WITH OUR "1980 PRESIDENTIAL SURVEY" SAID REAGAN WAS THEIR NUMBER ONE CHOICE FOR PRESIDENT.

NOW GOVERNOR REAGAN NEEDS OUR HELP.

THE ADS WE PRODUCE WILL BE TOUGH, HARD-HITTING ADS THAT WILL EXPOSE CARTER'S WEAKNESSES AS WELL AS PROMOTE REAGAN. I HAVE ENCLOSED TWO OF THEM FOR YOU TO SEE.

THESE ADS WERE WRITTEN BY TOP NOTCH PROFESSIONALS. THEY TALK ABOUT CARTER'S WEAK HANDLING OF IRAN, INFLATION, ETC. AND HOW REAGAN WOULD BE A MUCH BETTER PRESIDENT.

WE WILL RUN THESE ADS IN MAJOR CITIES AND PLACES WHERE

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MANY VOTERS WILL BE MAKING UP THEIR MINDS BETWEEN CARTER AND REAGAN IN THE NEXT FEW WEEKS.

IF YOU CAN SEND A CONTRIBUTION TO NCPAC TO HELP US HELP GOVERNOR REAGAN BY PUTTING THESE ADS ON THE AIR, I AM ALSO ASKING YOU TO SEND HIM THE ENCLOSED POSTCARD TELLING HIM OF YOUR SUPPORT.

THE POSTCARDS YOU AND OTHER CONSERVATIVES SEND IN WILL GO TO GOVERNOR REAGAN'S CAMPAIGN HEADQUARTERS. HIS STAFF WILL SEE THE DEEP LEVEL OF SUPPORT GOVERNOR REAGAN HAS WITH CONSERVATIVES LIKE YOU.

REMEMBER, YOU WILL NOT BE ABLE TO CONTRIBUTE DIRECTLY TO GOVERNOR REAGAN'S CAMPAIGN AFTER THE CONVENTION. BUT YOU CAN HELP GOVERNOR REAGAN GET ELECTED PRESIDENT BY SENDING YOUR CONTRIBUTION TO NCPAC'S "HELP REAGAN" PROJECT.

BUT WE MUST GET STARTED IMMEDIATELY.

ALL EXPERTS ARE SAYING THE CARTER-REAGAN RACE WILL BE EXTREMELY CLOSE. WE MUST GIVE GOVERNOR REAGAN ALL THE HELP WE CAN NOW.

PLEASE SEND NCPAC $15.00, $25.00 OR MORE IF YOU CAN.

WHATEVER YOU CAN SEND I KNOW GOVERNOR REAGAN WOULD DEEPLY APPRECIATE IT.

AWAITING YOUR REPLY.

SIGNED: JOHN T. DOLAN, CHAIRMAN, NCPAC

OVER, PLEASE

8304208

Exhibit #4.5

Diversified Direct, Inc.

INVOICE

2936 Prosperity Avenue · Fairfax (Merrifield), Virginia 22031 · (703) 573-1605

Remit to: DIVERSIFIED DIRECT, INC., c/o U.V.B. BOX 179, ALEXANDRIA, VA 22314

NO. A 1493

DATE Jan. 25, 1980

TO:

Reagon for President
1828 L St., N.W.
Washington, D.C. 20036
Suite 201

SHIPPED TO:

DMS
Waldorf, Md.

CUSTOMER ORDER NO.	DATE SHIPPED/ MAILED. 1/24/80	DDI JOB NO. DDI P.O. NO. 1141 DIVISIONAL JOB NO. 10246	SALESMAN SK	TERMS NET—30

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
	RE: PRINTING SERVICES, COMPUTER FORMS.		
26 M	Computer forms, with 2 color face and back.	29.19/M	758.94
	Authors Alterations:		
	Line shots:		10.80
	Labor: stripping:		72.00
	TOTAL INVOICE:		$841.74

8304208817

2/24/80
#1267/2264
$409.74

Exhibit No. 7

Diversified Direct, Inc.

INVOICE

2936 Prosperity Avenue · Fairfax (Merrifield), Virginia 22031 · (703) 573-1605

Remit to: DIVERSIFIED DIRECT, INC., c/o U.V.B. BOX 179, ALEXANDRIA, VA 22314

NO. A 1495

DATE Jan. 25, 198(

TO:

Reagon for President
1828 L St. N.W.
Washington, D.C. 20036
Suite 201
Attn: C. Swaim

SHIPPED TO:

Kiplinger Editors
East West Hwy.
Hyattsville, Md.

CUSTOMER ORDER NO.	DATE SHIPPED/ MAILED.	DDI JOB NO. / DDI P.O. NO. / DIVISIONAL JOB NO.	SALESMAN	TERMS
	1/24/80	1329 / 10259	SK	NET—30

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
	RE: PRINTING SERVICES, COMPUTER FORMS.		
13.5 M	Computer forms, with 2 color face and blank back.	32.97/M	445.09
	Authors Alterations: Labor: stripping:		31.50
	TOTAL INVOICE:		$476.59

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1/24/80
#126112266
#4477.2,

Exhibit

Diversified Direct, Inc.

INVOICE

2936 Prosperity Avenue · Fairfax (Merrifield), Virginia 22031 · (703) 573-1605

Remit to: DIVERSIFIED DIRECT, INC., c/o U.V.B. BOX 179, ALEXANDRIA, VA 22314

NO. B 5163

DATE 1-29-80

TO:

Reagan for Pres., Committee
1828 L. St. N.W.
Washington, D.C. 20036

SHIPPED TO:

MH-11682

DDI

CUSTOMER ORDER NO.	DATE SHIPPED/ MAILED.	DDI JOB NO. / DDI P.O. NO. / DIVISIONAL JOB NO.	SALESMAN	TERMS
	1-24-80	RFP 2010 / CH 6253 / 9305		NET-30

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
	RE: Mailing Services		
7,605	Stamp RAE 3-5¢	7.50/M	57.04
	Postage Used $1,140.75		
	Invoice Total		57.04

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3/24/

$1140.75

$1197.79

WHITE—CLIENT GREEN—REMITTANCE CANARY—ACCOUNTING PINK—DDI CHRONOLOGICAL

Exhibit F

RECEIVED FEB 19 1980

Diversified Direct, Inc.

INVOICE

2936 Prosperity Avenue • Fairfax (Merrifield), Virginia 22031 • (703) 573-1605

Remit to: DIVERSIFIED DIRECT, INC., c/o U.V.B. BOX 179, ALEXANDRIA, VA 22314

NO. B 5190

DATE 2/6/80

MH 011703

TO:

Reagan for President Committee
1828 L St. N.W.
Washington, D.C. 20036

SHIPPED TO:

Post Office

CUSTOMER ORDER NO.	DATE SHIPPED/ MAILED.	DDI JOB NO. / DDI P.O. NO. / DIVISIONAL JOB NO.	SALESMAN	TERMS
	2/1/80	RFP 2011 / CM 1067	932042	NET—30

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
	RE: MAILING SERVICES GR 225		
2,619	Burst, trim fold, match, stamp and insert.	45.00/M	$117.86
	Postage Used: $393.90		
	TOTAL INVOICE:		$117.86

8304071208 2

Prospect Okay CK 2-11-80

Mailed 2/14, 81

#652-24

$11,614.25

Exhibit

Ronald Reagan
Pacific Palisades, California 90272

January 25, 1980

Mr. M. Scott McFadden Jr.
702 Fairway Ln.
Columbia SC 29210

Dear Mr. McFadden:

Nancy and I would like you to have the enclosed photograph as a token of our appreciation for your past support of the Republican Party and conservative causes.

The picture was taken at our home in Pacific Palisades, California.

With your help we will win the White House. 1980 will be a year of Republican victory.

With that in mind, I've listed 4 questions which I'd like your answers to.

Please take a few minutes now to fill out your answers and mail them back to me today.

Your advice is important to me. And what you tell me by your answers will be an important tool in running a winning Reagan for President campaign.

For example, I'd like to know whether you believe Carter, Kennedy or Brown would be the most difficult Democrat candidate to beat.

Since I have personally selected you to give the answers for your area, I really do need to hear back from you right away.

If for some reason you don't want to answer my questions, I will need to know that so I can contact someone else in your area to take your place.

Running for President is an extremely difficult and long undertaking. Since I became a candidate just over three months ago, I have already visited 18 states and given over 70 speeches.

This solicitation is on behalf of REAGAN FOR PRESIDENT Committee, 8641 Airport Blvd., Suite 1430, Los Angeles, California 90045
REAGAN FOR PRESIDENT Committee—Paul Laxalt, Chairman, Ray Buchanan, Treasurer
A copy of our report is filed with and available for purchase from the Federal Election Commission, Washington, DC 20463

8304042082

But the fact I may win the chance to make America strong and proud again, to enrich the future of our children, makes the grueling days on the road all worthwhile. With your help, I will win that chance. Let me share some of my thoughts with you on a few of the issues of special concern to me:

Since 1976 we have seen the Democrats:

- give away our canal in Panama to a marxist dictator
- allow America to be humiliated by a terrorist regime in Iran
- fail to stand up to Communist aggression in Afghanistan, Angola, and other trouble spots in the world
- allow the presence of Russian combat troops only 90 miles from our own shores in Communist Cuba
- sign a pro-Soviet SALT II Treaty which would further weaken our military defenses and watch the Russians pull far ahead of us in the arms race
- destroy our intelligence capability so that we can be humiliated and embarassed around the world.

As President, I'll rebuild America's defenses. We need a coherent foreign policy that measures everything by this standard; what is best for the United States of America? It's time we stopped worrying about whether other countries in the world like us and start worrying about whether they respect us.

America must have strong, new leadership if we are to stand up to the Communist attack abroad and restore prosperity and opportunity at home. I want to provide that leadership more than anything I have wanted in my life.

But without the necessary funds, I won't be able to run a winning campaign or stand up for the American ideals which you and I share.

Every respected national and regional poll shows that I can win. But not without your help.

Our campaign treasurer, Bay Buchanan, tells me we must raise $3,595,000 in the next two months. We need

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$230,000 just to pay for the rent, telephones, printing, postage, buttons, bumper stickers and other immediate expenses in the next two weeks.

<u>All the favorable polls in the world won't help if we can't raise this money</u>.

When you return your answers to me, perhaps you can send a check for $10, $15, $25 or even $50. Or possibly you can send us as much as $150 or $250.

Please don't think your contribution won't make a difference in my campaign because it will. I don't have alot of wealthy businessmen sending me checks for $1,000 each.

My campaign is mostly funded by $25 and $50 contributions or less.

If you could send a large check, we certainly could use it. This is maybe even as much as $250 or $500. But anything you can send will be deeply appreciated because it shows I have your trust and support.

I plan to hold a meeting of my top campaign advisors within the next 14 days. I want to discuss your answers to the questions I've enclosed at that meeting.

So please try to fill out and mail back the enclosed reply form today so I will know whether I can count on your financial help and your political advice. Let me know who you think will be the toughest Democrat to beat, and please send a check for $15, $25, $35, $50, or even $100 or more.

In 1980 we can elect a Republican President but only if you and other good people like you do their part now.

I'll be anxiously looking forward to hearing from you.

Sincerely,

Ronald Reagan

P.S. Again, it's important that I have your answers in the next 14 days. I must also know whether I can count on your support and whether you will help us meet our financial budget projections. Please let me hear from you today.

8304012082 3

From:

Mr. Lamar P. Brown
710 Seven Oaks Ln.
Columbia SC 29210

Bill

(Please fill out as completely as possible)

1. Do you consider yourself: ☐ Republican
   ☐ Democrat
   ☐ Independent

2. Which 3 issues in your opinion should I stress in my campaign?
   (Check 3 only)
   ☐ Inflation
   ☐ National Defense
   ☐ Energy
   ☐ Decline in Morality
   ☐ Big Government
   ☐ Welfare Fraud
   ☐ Other _____

3. Do you consider yourself: ☐ conservative
   ☐ moderate
   ☐ liberal

4. Who do you feel would be easier for me to defeat?
   ☐ Jimmy Carter
   ☐ Teddy Kennedy
   ☐ Jerry Brown

5. Governor Reagan, to demonstrate my support for you, I am enclosing my check for
   ☐ 15 ☐ 25 ☐ 50 ☐ 100
   ☐ 250 ☐ 500 ☐ 1000 ☐ Other _____

PLEASE MAKE YOUR CHECK PAYABLE TO REAGAN FOR PRESIDENT

I understand the following information is required by federal law:

Occupation _____

Place of Business _____

City/State _____

This solicitation is on behalf of REAGAN FOR PRESIDENT Committee, 3141 Airport Blvd., Suite 1430, Los Angeles, California 90045
REAGAN FOR PRESIDENT Committee—Paul Laxalt, Chairman, Pat Buchanan, Treasurer
A copy of our report is filed with and available for purchase from the Federal Election Commission, Washington D.C. 20463

8304042082

Exhibit F-6 A-1

Diversified Direct, Inc.

INVOICE

2936 Prosperity Avenue • Fairfax (Merrifield), Virginia 22031 • (703) 573-1605

Remit to: DIVERSIFIED DIRECT, INC., c/o U.V.B. BOX 179, ALEXANDRIA, VA 22314

NO. A 1539

DATE Jan. 31, 1980

TO:

Reagan for President
1828 L St., N.W.
uite 201
Washington, D.C. 20036

Attn: C. Swaim

SHIPPED TO:

Kiplinger

CUSTOMER ORDER NO.	DATE SHIPPED/1/31/80 MAILED.	DDI JOB NO. / DDI P.O. NO. 1343 / DIVISIONAL JOB NO. 10281	SALESMAN SK	TERMS NET—30

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
	RE: PRINTING SERVICES, COMPUTER FORMS.		
16,793	Computer forms, with 2 color face and back.	48.88/M	820.84
	Authors Alterations:		
	Line shots:		2.70
	Labor: stripping:		31.50
	TOTAL INVOICE:		$855.04

8304012081

3/24/80

Exhibit FEC 4

Diversified Direct, Inc.

INVOICE

2938 Prosperity Avenue • Fairfax (Merrifield), Virginia 22031 • (703) 573-1605

NO. A 1540

Remit to: DIVERSIFIED DIRECT, INC., c/o U.V.B. BOX 179, ALEXANDRIA, VA 22314

DATE Jan. 31, 19

TO:

Reagan for President
1828 L St., N.W.
Washington, D.C. 20036
Suite 201

Attn: C. Swaim

SHIPPED TO:

Kiplinger

CUSTOMER ORDER NO.	DATE SHIPPED/ MAILED.	DDI JOB NO. / DDI P.O. NO. / DIVISIONAL JOB NO.	SALESMAN	TERMS
	1/31/80	1340 / 10277	SK	NET

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
	RE: PRINTING SERVICES, COMPUTER FORMS.		
16,294	Computer forms, with 2 color face and coded: No $ amt.	22.71/M	370.03
19,302	Computer forms, same specs. Coded: with $ amt.	same	438.34
	Authors Alterations:		
	Line shots:		6.00
	Labor: stripping:		45.00
	TOTAL INVOICE:		$859.37

3/24/80
#1267 2:11
$469.24

WHITE—CLIENT GREEN—REMITTANCE CANARY—ACCOUNTING PINK—DDI CHRONOLOGICAL

RECEIVED FEB 1 1980

Exhibit 78

Diversified Direct, Inc.

INVOICE

2936 Prosperity Avenue · Fairfax (Merrifield), Virginia 22031 · (703) 573-1605

Remit to: DIVERSIFIED DIRECT, INC., c/o U.V.B. BOX 179, ALEXANDRIA, VA 22314

NO. A 1555

DATE Feb 7, 1980

TO:

Reagan for President
1828 L St., N.W.
Suite 201
Washington, D.C. 20036

Attn: C. Swaim

SHIPPED TO:

DMS
Waldorf, Md.

CUSTOMER ORDER NO.	DATE SHIPPED/ MAILED,	DDI JOB NO. / DDI P.O. NO. / DIVISIONAL JOB NO.	SALESMAN	TERMS
	2/4/80	1344 / 10278	SK	NET—30

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
	RE: PRINTING SERVICES, LETTERS.		
38,605	Letters, with 2 color face and back.	24.39/M	941.57
	Authors Alterations: Labor: stripping:		9.00
	TOTAL INVOICE:		$950.57

8 8 0 4 0 + 2 0 8 + 7

Group III - 1+F
OK, pay
CJS
2-11-80

589/204
4-22-80
$1961.27

WHITE—CLIENT GREEN—REMITTANCE CANARY—ACCOUNTING PINK—DDI CHRONOLOGICAL

Exhibit F-9 4/6

Diversified Direct, Inc.

INVOICE

2936 Prosperity Avenue • Fairfax (Merrifield), Virginia 22031 • (703) 573-1605

Remit to: DIVERSIFIED DIRECT, INC., c/o U.V.B. BOX 179, ALEXANDRIA, VA 22314

NO. B 5185

DATE Jan. 31, 198(

TO:

Reagan for President
1828 L St. N.W. Suite 201
Washington, D.C. 20036

SHIPPED TO: MH 011697

Post Office

CUSTOMER ORDER NO.	DATE SHIPPED/ MAILED. 1/29/80 1/30/80	DDI JOB NO. RF 2011 DDI P.O. NO. CM 1067 DIVISIONAL JOB NO. 9320	SALESMAN	TERMS NET—30

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
	RE: MAILING SERVICES GR 225.		
22,389	Insert, stamp, burst, trim & fold, match.	45.00/M	1,007.5
	Postage Used: $3,363.15		
	TOTAL INVOICE:		$1,007.5

8304012034-5

Okay
Bob
2-6-80

3/24/8
#126722
$4697.24

WHITE—CLIENT GREEN—REMITTANCE CANARY—ACCOUNTING PINK—DDI CHRONOLOGICAL

Exhibit P-10

Ronald Reagan
Pacific Palisades, California 90272

February 11, 1980

R Bay Buchanan
Apt 502
5974 Buckingham Parkway
Culver City, CA 90230

Dear Mr. Buchanan:

This may be the most important letter I've ever written you.

By now I'm sure you've heard the results of the Iowa Caucuses.

Although the public opinion polls showed on Caucus Day that I was favored by more Republican voters than any other candidate, enough of my supporters didn't turn out for me to win.

Although I'm confident that we are well organized and can win in New Hampshire, we can't let this happen again.

Once again the polls show that if every Reagan supporter votes in the early primary, we will win. But if the turn out of our supporters is light, we could be defeated.

I am deeply grateful for your past contribution of $100. But if we are to win in New Hampshire, I must ask you to send me a check in the same amount as before or $200 or $300 if you possibly could.

Let me explain.

We have the dedicated volunteers in New Hampshire to call every Reagan supporter and remind them to vote - but as of today we don't have the $279,000 which we need to install telephone banks in our headquarters in New Hampshire, Vermont, Massachusetts, Florida and South Carolina.

The telephone company insists on large deposits in advance. Frankly, we must raise this $279,000 in the next two weeks.

All the favorable polls in the world won't help if we can't

8304042089

This solicitation is on behalf of REAGAN FOR PRESIDENT Committee, 9545 Anson Blvd., Suite 1430, Los Angeles California 90045
REAGAN FOR PRESIDENT Committee - Paul Laxalt, Chairman, Ray Buchanan, Treasurer
A copy of our report is filed with the Federal Election Commission and is available for purchase from the Federal Election Commission, Washington, DC 20463

raise this money for telephones today.

Please don't think that your contribution won't make a difference in my campaign because it will.

If you could send a large check today we really could use it. But anything you can send will be deeply appreciated because it shows I still have your trust and support.

I believe we can make this country great again.

America must have strong, new leadership if we are to stand up to the Communist attack abroad and restore opportunity and prosperity at home. I want to provide that leadership more than anything I've wanted in my life.

Your friendship and support have meant so much to me in the past. I really need your help now.

I'm enclosing one of my favorite snapshots of Nancy and me that I'd like you to have as a small token of our appreciation.

I'm confident that we can win in New Hampshire. Please let me hear from you today.

Sincerely,

Ronald Reagan

RONALD REAGAN

P.S. The telephone company requires payment in advance to install our primary day telephones. Please let me hear from you today.

8304 2-0-9-3-0

MEMO REPLY MEMO REPLY MEMO

TO: Governor Ronald Reagan

SUBJECT: Emergency in New Hampshire

FROM:

R Bay Buchanan
Apt 502
5974 Buckingham Parkway
Culver City, CA 90230

90230BCHN974 R
AAA

8304042083I

Dear Governor Reagan,

YES, I want to help win in New Hampshire. We must have the telephones needed to get out every Reagan voter.

Enclosed is my maximum contribution of:

☐ $100 ☐ $200 ☐ $300 ☐ _____ Other.

towards the $279,000 we must raise immediately. PLEASE MAKE YOUR CHECK PAYABLE TO REAGAN FOR PRESIDENT.

I understand the following information is required by Federal law:

Occupation _____

Place of Business _____

City/State _____

1

This solicitation is on behalf of REAGAN FOR PRESIDENT Committee 9841 Airport Blvd Suite 1410 Los Angeles, California 90045
REAGAN FOR PRESIDENT Committee—Paul Laxalt, Chairman, R. Bay Buchanan, Treasurer
A copy of our report is filed with the Federal Election Commission Washington DC 20463

Exhibit P-11

Diversified Direct, Inc.

INVOICE

2936 Prosperity Avenue · Fairfax (Merrifield), Virginia 22031 · (703) 573-4005

Remit to: DIVERSIFIED DIRECT, INC., c/o U.V.B. BOX 179, ALEXANDRIA, VA 22314

DATE 2/18/80

TO:

Reagan for President
1828 L St. N.W.
Washington, D.C. 20036
Suite 201
Attn: C. Swaim

SHIPPED TO:

Central Data Processing
Forestville, Md.

CUSTOMER ORDER NO.	DATE SHIPPED/MAILED.	DDI JOB NO. / DDI P.O. NO. / DIVISIONAL JOB NO.	SALESMAN	TERMS
	2/18/80	1434 / 10330	SK	NET—30

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
	RE: PRINTING SERVICES, COMPUTER FORMS.		
200 M	Computer forms, with 2 color face and back.	14.87/M	2,974.00
	TOTAL INVOICE:		$2,974.00

8304042038

OK AMB mailing #14

2-3/110.80 Prompt

paid May 14, 80 #652-204 $11,614.25

WHITE—CLIENT GREEN—REMITTANCE CANARY—ACCOUNTING PINK—DDI CHRONOLOGICAL

GOLDENROD—DDI JOB JACKET

Exhibit

Diversified Direct, Inc.

INVOICE

2936 Prosperity Avenue • Fairfax (Merrifield), Virginia 22031 • (703) 573-1605

Remit to: DIVERSIFIED DIRECT, INC., c/o U.V.B. BOX 179, ALEXANDRIA, VA 22314

NO. A 1617

DATE 2/18/80

TO:

Reagan for President
1828 L St., N.W.
Washington; D.C. 20036
Suite 201
Attn: C. Swaim

SHIPPED TO:

Central Data Processing
Forestville, Md.

CUSTOMER ORDER NO.	DATE SHIPPED/ MAILED. 2/18/80	DDI JOB NO. 10331 DDI P.O. NO. 1427 DIVISIONAL JOB NO.	SALESMAN SK	TERMS NET--30

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
	RE: PRINTING SERVICES, COMPUTER FORMS.		
100 M	Computer forms, with 2 color face.	14.72/M	1,457.00
	TOTAL INVOICE:		$1,457.00

8304048

Invoice #1617

Rec'd response dtd 8-21-80
Rec'd 8-29-80

Paid
May 14, 80
#652-204
$11,614.25

Exhibit P-13

Diversified Direct, Inc.

INVOICE

2936 Prosperity Avenue · Fairfax (Merrifield), Virginia 22031 · (703) 573-1605

Remit to: DIVERSIFIED DIRECT, INC., c/o U.V.B. BOX 179, ALEXANDRIA, VA 22314

NO. A 1655

DATE 2/25/80

TO:

Reagan for President
1828 L St., N.W.
Washington, D.C. 20036

Attn: C. Swaim

SHIPPED TO:

CUSTOMER ORDER NO.	DATE SHIPPED/ MAILED.	DDI JOB NO. / DDI P.O. NO. / DIVISIONAL JOB NO.	SALESMAN	TERMS
	2/22/80	1441,1440 10354	SK	NET—30

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
	RE: PRINTING SERVICES, COMPUTER FORMS.		
55 M	Computer forms, with 2 color face and back. 1 - UP.	21.58/M	1,186.90
27.5 M	Computer forms with same specs. 2 - Up.	22.71/M	624.52
	TOTAL INVOICE:		$1,811.42

3304208

OK pays Invoice #14

3-3/10-80 pr. 2nd

Paid. Check #652-204 $11,614.25

Exhibit

Diversified Direct, Inc.

INVOICE

2936 Prosperity Avenue • Fairfax (Merrifield), Virginia 22031 • (703) 573-4605

Remit to: DIVERSIFIED DIRECT, INC., c/o U.V.B. BOX 179, ALEXANDRIA, VA 22314

NO. B 5294

DATE 3-27-80

TO:

Regan for President Committee
1828 L st. N.W.
Washington, D.C. 20036

SHIPPED TO: MH-11806

Post Office

CUSTOMER ORDER NO.	DATE SHIPPED/ MAILED.	DDI JOB NO. RFP 2030 DDI P.O. NO. CM 1102 DIVISIONAL JOB NO. 9630	SALESMAN	TERMS NET—30

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
3	RE: MAILING SERVICES,		
230,505	Insert, Burst, fold, stamp and match.	38.25/M	8,816.82
	CODE QUANTITY DROP DATE		
	GR233 50,803 3/5/80		
	" 43,895 3/6/80		
	" 27,976 3/6/80		
	" 12,650 3/7/80		
	" 20,660 3/14/80		
	" 7,033 3/17/80		
	" 37,912 3/21/80		
	" 14,066 3/24/80		
	" 15,510 3/25/80		
	230,505		
19,995	Stamp to projected count:	5.00/M	99.98
			8,916.80
	Postage Used: $34,616.25		
	20% charge for excess postage affixed on 19,995 pieces @.15¢ due to client over-estimate.		+599.85
	TOTAL INVOICE:		$9,516.65

1½% mailing
all pcts prospect
Cut
on cuts!

Exhibit P-25

8304042086

Mr. Thomas C. Brown, Jr.
492 Hodges Dr
Orangeburg, South Carolina 29115

Dear Mr. Brown:

Exhibit P-23

Ronald Reagan
Pacific Palisades, California 90272

March 3, 1980

Mr. Ladson Beach
PO Box 1304
Orangeburg, South Carolina 29115

Dear Mr. Beach:

Nancy and I would like you to have the enclosed photograph as a token of our appreciation for your past support of the Republican Party and conservative causes.

The picture was taken at our home in Pacific Palisades, California.

With your help we will win the White House. 1980 will be a year of Republican victory.

With that in mind, I've listed 4 questions which I'd like your answers to.

Please take a few minutes now to fill out your answers and mail them back to me today.

Your advice is important to me. And what you tell me by your answers will be an important tool in running a winning Reagan for President campaign.

For example, I'd like to know whether you believe Carter, Kennedy or Brown would be the most difficult Democrat candidate to beat.

Since I have personally selected you to give the answers for your area, I really do need to hear back from you right away.

If for some reason you don't want to answer my questions, I will need to know that so I can contact someone else in your area to take your place.

Running for President is an extremely difficult and long undertaking. Since I became a candidate just over three months ago, I have already visited 18 states and given over 70 speeches.

8304042083 7

This solicitation is on behalf of REAGAN FOR PRESIDENT Committee, 5541 Airport Blvd., Suite 1430, Los Angeles, California 90045
REAGAN FOR PRESIDENT Committee—Paul Laxalt, Chairman, Ray Buchanan, Treasurer
A copy of our report is filed with and available for purchase from the Federal Election Commission, Washington, D.C. 20463

But the fact I may win the chance to make America strong and proud again, to enrich the future of our children, makes the grueling days on the road all worthwhile. With your help, I will win that chance. Let me share some of my thoughts with you on a few of the issues of special concern to me:

Since 1976 we have seen the Democrats:

- give away our canal in Panama to a marxist dictator
- allow America to be humiliated by a terrorist regime in Iran
- fail to stand up to Communist aggression in Afghanistan, Angola, and other trouble spots in the world
- allow the presence of Russian combat troops only 90 miles from our own shores in Communist Cuba
- sign a pro-Soviet SALT II Treaty which would further weaken our military defenses and watch the Russians pull far ahead of us in the arms race
- destroy our intelligence capability so that we can be humiliated and embarassed around the world.

As President, I'll rebuild America's defenses. We need a coherent foreign policy that measures everything by this standard; what is best for the United States of America? It's time we stopped worrying about whether other countries in the world like us and start worrying about whether they respect us.

America must have strong, new leadership if we are to stand up to the Communist attack abroad and restore prosperity and opportunity at home. I want to provide that leadership more than anything I have wanted in my life.

But without the necessary funds, I won't be able to run a winning campaign or stand up for the American ideals which you and I share.

Every respected national and regional poll shows that I can win. But not without your help.

Our campaign treasurer, Bay Buchanan, tells me we must raise $3,595,000 in the next two months. We need

8304042083 8

8304042083 9

$230,000 just to pay for the rent, telephones, printing, postage, buttons, bumper stickers and other immediate expenses in the next two weeks.

All the favorable polls in the world won't help if we can't raise this money.

When you return your answers to me, perhaps you can send a check for $10, $15, $25 or even $50. Or possibly you can send us as much as $150 or $250.

Please don't think your contribution won't make a difference in my campaign because it will. I don't have alot of wealthy businessmen sending me checks for $1,000 each.

My campaign is mostly funded by $25 and $50 contributions or less.

If you could send a large check, we certainly could use it. This is maybe even as much as $250 or $500. But anything you can send will be deeply appreciated because it shows I have your trust and support.

I plan to hold a meeting of my top campaign advisors within the next 14 days. I want to discuss your answers to the questions I've enclosed at that meeting.

So please try to fill out and mail back the enclosed reply form today so I will know whether I can count on your financial help and your political advice. Let me know who you think will be the toughest Democrat to beat, and please send a check for $15, $25, $35, $50, or even $100 or more.

In 1980 we can elect a Republican President but only if you and other good people like you do their part now.

I'll be anxiously looking forward to hearing from you.

Sincerely,

Ronald Reagan

P.S. Again, it's important that I have your answers in the next 14 days. I must also know whether I can count on your support and whether you will help us meet our financial budget projections. Please let me hear from you today.

From:

Mr. Lamson Beach
PO Box 1304
Orangeburg, South Carolina 29115

(Please fill out as completely as possible)

1. Do you consider yourself: ☐ Republican
   ☐ Democrat
   ☐ Independent

2. Which 3 issues in your opinion should I stress in my campaign?
   (Check 3 only)
   ☐ Inflation
   ☐ National Defense
   ☐ Energy
   ☐ Decline in Morality
   ☐ Big Government
   ☐ Welfare Fraud
   ☐ Other _____

3. Do you consider yourself: ☐ conservative
   ☐ moderate
   ☐ liberal

4. Who do you feel would be easier for me to defeat?
   ☐ Jimmy Carter
   ☐ Teddy Kennedy
   ☐ Jerry Brown

5. Governor Reagan, to demonstrate my support for you, I am enclosing my check for
   ☐ 15 ☐ 25 ☐ 50 ☐ 100
   ☐ 250 ☐ 500 ☐ 1000 ☐ Other _____

PLEASE MAKE YOUR CHECK PAYABLE TO REAGAN FOR PRESIDENT

I understand the following information is required by federal law:

Occupation _____

Place of Business _____

City/State _____

This solicitation is on behalf of REAGAN FOR PRESIDENT Committee, 5941 Airport Blvd., Suite 1430, Los Angeles, California 90045
REAGAN FOR PRESIDENT Committee—Paul Laxalt, Chairman, Bay Buchanan, Treasurer
A copy of our report is filed with and available for purchase from the Federal Election Commission, Washington D.C. 20463

8304042084C

Exhibit F-16

Diversified Direct, Inc.

INVOICE

2936 Prosperity Avenue · Fairfax (Merrifield), Virginia 22031 · (703) 573-1605

Remit to: DIVERSIFIED DIRECT, INC., c/o U.V.B. BOX 179, ALEXANDRIA, VA 22314

NO. A 1657

DATE 2/29/80

TO:

Reagan for President
1828 L St., N.W.
Suite 201
Washington, D.C. 20036

Attn: C. Swaim

SHIPPED TO:

Wiland & Assoc.
Culpepper, Va.

CUSTOMER ORDER NO.	DATE SHIPPED/ MAILED. 2/29/80	DDI JOB NO. / DDI P.O. NO. 1454 / DIVISIONAL JOB NO. 10383	SALESMAN SK	TERMS NET—30

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
	RE: PRINTING SERVICES, COMPUTER FORMS.		
48,251	Computer forms, with 2 color face and back.	21.58/M	1,041.25
	Authors Alterations: Labor: stripping:		18.00
	TOTAL INVOICE:		$1,059.25

8304042081 1

OK auth. municip. pt 16

pt

Tray 14, 8

45c/44z-2c-1

$11,614.25

PINK—DDI CHRONOLOGICAL

Exhibit E-17

Diversified Direct, Inc.

INVOICE

2938 Prosperity Avenue • Fairfax (Merrifield), Virginia 22031 • (703) 573-1605

Remit to: DIVERSIFIED DIRECT, INC., c/o U.V.B. BOX 179, ALEXANDRIA, VA 22314

NO. A 1689

DATE 2/29/80

TO:

Reagan for President
1828 L St., N.W.
Suite 201
Washington, D.C. 20036

SHIPPED TO:

Wiland &

CUSTOMER ORDER NO.	DATE SHIPPED/ MAILED.	DDI JOB NO. / DDI P.O. NO. / DIVISIONAL JOB NO.	SALESMAN	TERMS
	2/29/80	1453 / 10384	SK	NET-30

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
	RE: PRINTING SERVICES, COMPUTER FORMS.		
23 M	Computer forms, with 2 color face and coded: With $ Amt.	17.25/M	396.75
24 M	Computer forms, with same specs. Coded: No $ Amt.	17.25/M	414.00
	TOTAL INVOICE:		$810.75

8304042081

Invoice #16 OK w/ us

R.DS.FO
REP.HF

Cut

pd.
Dec 14, 83
#652/ 224
$11,614.25

Exhibit #16

Diversified Direct, Inc.

INVOICE

2936 Prosperity Avenue • Fairfax (Merrifield), Virginia 22031 • (703) 573-1605

Remit to: DIVERSIFIED DIRECT, INC., c/o U.V.B. BOX 179, ALEXANDRIA, VA 22314

NO. A 1806

DATE 3/19/80

TO:

Reagan for President
1828 L St., N.W.
Suite 201
Washington, D.C. 20036
Attn: C. Swaim

SHIPPED TO:

DMS
Waldorf, Md.

CUSTOMER ORDER NO.	DATE SHIPPED/ MAILED.	DDI JOB NO. / DDI P.O. NO. / DIVISIONAL JOB NO.	SALESMAN	TERMS
	3/18/80	1621 / 10464	SK	NET—30

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
	RE: PRINTING SERVICES, LETTERS.		
45 M	2 Sheet letters, with 2 color face and back.	22.46/M	1,010.70
	TOTAL INVOICE:		$1,010.70

OK. Mailing #16

Pd. Thru 14, 15
652 ~~653~~ 2.
$11,614.25

8304208

Exhibit 7.19

Diversified Direct, Inc.

INVOICE

2934 Prosperity Avenue • Fairfax (Merrifield), Virginia 22031 • (703) 573-1605

Remit to: DIVERSIFIED DIRECT, INC., c/o U.V.B. BOX 179, ALEXANDRIA, VA 22314

NO. B 5309

DATE April 7, 1980

MM 011823

TO:

Reagan for President Committee
1828 L St., N.W.
Washington, D.C. 20036

SHIPPED TO:

Post Office

CUSTOMER ORDER NO.	DATE SHIPPED/ MAILED. 4/2/80	DDI JOB NO. RF 2039 DDI P.O. NO. CM 1347 DIVISIONAL JOB NO. 9724	SALESMAN	TERMS NET-30

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
	RE: MAILING SERVICES GR 337		
43,021	Burst, trim, and fold, stamp, insert and seal.	25.75/M	1,107.79
	Postage Used: $3,620.97		
	TOTAL INVOICE:		$1,107.79

8304208

OK WB

- Bal. Due 15 ??
- 734 - 204
$17,527 ??

Bal. 10.80
14th mailing
OFP

Exhibit

Diversified Direct, Inc.

INVOICE

2936 Prosperity Avenue • Fairfax (Merrifield), Virginia 22031 • (703) 573-1605

Remit to: DIVERSIFIED DIRECT, INC., c/o U.V.B. BOX 179, ALEXANDRIA, VA 22314

NO. B 5310

DATE April 2, 1980

MH 011819

TO:

Reagan for President Committee
1828 L St., N.W.
Washington, D.C. 20036

SHIPPED TO:

Post Office

CUSTOMER ORDER NO.	DATE SHIPPED/ MAILED.	DDI JOB NO. RFP 2037 DDI P.O. NO. CM 1357 DIVISIONAL JOB NO. 9722	SALESMAN	TERMS
	3/31/80		SK	NET—30

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
	RE: MAILING SERVICES, GR 137.		
11,075	Burst, trim, fold, stamp carr., & RAEm Match, insert.	61.75/M	683.88
	Postage Used: $3,324.90		
	TOTAL INVOICE:		$683.88

8304072081 5

OK cwb

P2: L 3/31/80
16th mailing
Comp 1 P.F.P
Cwb

11,525
- 7,249 - 204
4,072 1/2

Exhibit P-21

Diversified Direct, Inc.

INVOICE

2936 Prosperity Avenue - Fairfax (Merrifield), Virginia 22031 · (703) 573-1605

Remit to: DIVERSIFIED DIRECT, INC., c/o U.V.B. BOX 179, ALEXANDRIA, VA 22314

NO. B 5301

DATE April 1, 1980

MH 011817

TO:

Reagan for President Committee
1828 L St., N.W.
Washington, D.C. 20036

SHIPPED TO:

Post Office

CUSTOMER ORDER NO.	DATE SHIPPED/ MAILED.	DDI JOB NO. RFP 2038 DDI P.O. NO. CM 1348 DIVISIONAL JOB NO. 9723	SALESMAN	TERMS
	3/31/80		SK	NET—30

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
	RE: MAILING SERVICES, GR 237.		
36,755	Burst, trim and fold, stamp, match, insert and seal.	45.00/M	1,653.98
	Postage Used: $5,519.40		
	TOTAL INVOICE:		$1,653.98

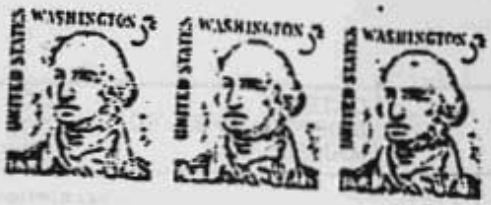
8304-2081

B.DOM. RC
16th mailing
(no) PD

4-1-80
-729-24-
$7527 1/2

DISTRIBUTION: WHITE—PAYMENT COPY YELLOW—BILL TO COPY CANARY—ACCOUNTING PINK—DDI CHRONOLOGICAL

Senator Orrin Hatch
WASHINGTON, D.C. 20510



8304042084 17

Senator Orrin Hatch
WASHINGTON, D.C. 20510

Mr. Morey I Stearns
1114 Parker St
Springfield, MA 01129

Dear Mr. Stearns:

Would the Russians have brutally savaged Afghanistan and pointed a red dagger towards the oil fields of the Middle East, if Ronald Reagan were President?

Would Iranian terrorists have held Americans hostage and humiliated our nation in the eyes of the world, if our President were Ronald Reagan?

Would Ronald Reagan have let the United States throw away its military superiority to the point where the Soviet Union and its mercenaries are emboldened to invade countries around the world?

Of course not.

There are many fine candidates for President this year, but there is only one candidate the Russians and their puppets cannot afford to see elected, and he is Ronald Reagan.

But you know that since Governor Reagan tells me you are one of his most trusted supporters.

That's why I am writing to you today - - to ask you to stand up with me for Ronald Reagan. To stand up with me for a thorough change of leadership in Washington.

I know you've been generous before but frankly the Reagan campaign urgently needs your check for $25.00 or $50.00.

We must raise $249,000 in the next two weeks to keep the Reagan campaign in Wisconsin, Texas, California, and all the western states on schedule.

This money is urgently needed for printing, postage, rent, telephones and radio and TV time.

Paid for by REAGAN FOR PRESIDENT Committee 9841 Airport Blvd Suite 1430 Los Angeles California 90045
REAGAN FOR PRESIDENT Committee - Paul Laxalt Chairman Bill Buchanan Treasurer
Political Advertisement Paid for by the Reagan Federal Election Committee Washington DC 20463

8304042084E

For many years now, Washington has been dominated by an elite clique which some people call the "Liberal Establishment." Presidents come and go, but the elitists who are responsible for our apologetic foreign policy and second-rate defense remain in Washington year after year undermining our nation's security.

Some absolutely vital questions we should ask about each of the candidates are:

- What kind of people will he bring with him to Washington?

- Will they be the same old crowd who feel ashamed of America's prosperity and power?

- Will they be the same old wishful thinkers who believe the Russians are as honest and trustworthy as we are?

- Will they be the same old proponents of unilateral disarmament?

- Will they be the same old appeasers?

My point is this: Unless we bring to Washington genuinely fresh leadership - - all across the board - - we will tragically have missed what is perhaps our last chance to restore American superiority and respect.

Only Ronald Reagan is free of ties to the elitist Liberal Establishment which has brought our country to its knees. Only by electing Ronald Reagan can we be sure of really changing things.

We are in very serious trouble. As a member of the United States Senate, I can tell you that matters are even worse than the President will admit to the American people. If ever there was a time when America needed a courageous and forthright leader, the time is now.

If ever there was a time when we needed a President and a government of men and women who are proud of America and willing to defend her, the time is now. If ever there was a time to totally reject the pessimism, defeatism and appeasement of the past, the time is now.

I believe had Ronald Reagan been President, the B-1 bomber would have been built, our Navy would still be the world's mightiest. And, our troops would have the equipment they desperately need to deter war. Because Ronald Reagan has always advocated a defense strong enough to command the world's respect, we would not have felt compelled to surrender the Panama Canal and compel-

8304208419

led to abandon our loyal allies on Taiwan. We would not have suffered a long train of humiliating defeats of which Iran and Afghanistan are only the latest.

I know that you and I share Ronald Reagan's vision of a strong, proud and respected America. I believe we have never shared the defeatist viewpoint of the Liberal Establishment any more than Ronald Reagan has.

We have the opportunity to help elect the kind of straight-forward President Americans yearn for. A man who will bring to Washington a wholly new team of men and women with a completely fresh point of view.

I am going to ask you to do two important things.

First, please use the yellow envelope I have enclosed for you to send me the largest contribution you can afford today..

Second, if you can, please try to raise a similar amount from three or four of your friends and neighbors. $10, $15, $25 or even $50 extra will give Governor Reagan's campaign a big boost. Please use the blue envelope to send me any money you can raise from your friends in the next two weeks.

We must elect Ronald Reagan. I urge you to send your largest possible contribution today. Let's have an honest-to-goodness change in Washington.

With warmest regards, I am

Orrin G. Hatch
U.S. Senate

P.S. I am working my heart out to elect Ronald Reagan. I hope you will help me by sending your answer in the yellow envelope today.

P.P.S. If you can, remember to send the blue envelope to me in two weeks.

8304042083O

Please mail today in the yellow return envelope.

TO: Senator Orrin Hatch

FROM: Mr. Morey I Stearns
1114 Parker St
Springfield, Massachusetts 01129

ORD 01129STRN114

Dear Senator Hatch,

Yes, we *must* have a President who will stand up to the Communist attack abroad. We must elect Ronald Reagan.

Enclosed is my contribution of:

☐$25.00 ☐$50.00 ☐$75.00 ☐_____ Other

towards the $249,000 we need to raise immediately. PLEASE MAKE YOUR CHECK PAYABLE TO REAGAN FOR PRESIDENT.

I understand the following information is required by Federal law:

Occupation _____

Place of Business _____

City/State _____

This solicitation is on behalf of REAGAN FOR PRESIDENT Committee 1043 Airport Blvd. Suite 1430 Los Angeles California 90045
REAGAN FOR PRESIDENT Committee Paul Laxalt Chairman Ray Buchanan Treasurer
A copy of our report is filed with and available for purchase from the Federal Election Commission Washington DC 20463

8304074208351

Exhibit F-84-6

Diversified Direct, Inc.

INVOICE

2936 Prosperity Avenue • Fairfax (Merrifield), Virginia 22031 • (703) 573-4805

Remit to: DIVERSIFIED DIRECT, INC., c/o U.V.B. BOX 179, ALEXANDRIA, VA 22314

NO. A 1911

DATE April 15, 19[illegible]

TO:

Reagan for President
c/o Cheryl Swaim
435 Lee Street
Alexandria, Va. 22314

SHIPPED TO:

Wiland & Assoc.
Culpepper, Va.

CUSTOMER ORDER NO.	DATE SHIPPED/ MAILED.	DDI JOB NO. / DDI P.O. NO. / DIVISIONAL JOB NO.	SALESMAN	TERMS
	4/1 4/80	1697 / 10593	SK	NET-30

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
	RE: PRINTING SERVICES, COMPUTER FORMS.		
28.5 M	Computer forms, with 2 color face and coded: w/o $ amt.	20.55/M	585.67
27 M	Computer forms, with same specs. Coded: w $ amt.	20.55/M	554.85
			1,140.52
	4% Va. tax:		45.62
	TOTAL INVOICE:		$1,186.14

B30402080

PINK—DDI CHRONOLOGICAL

Exhibit P-24

Diversified Direct, Inc.

INVOICE

2936 Prosperity Avenue · Fairfax (Merrifield), Virginia 22031 · (703) 573-1605

Remit to: DIVERSIFIED DIRECT, INC., c/o U.V.B. BOX 179, ALEXANDRIA, VA 22314

NO. A 1955

DATE April 21, 19:

TO:

Reagan for President
c/o Cheryl Swaim
435 N. Lee St.
Alexandria, Va. 22314

SHIPPED TO:

DMS
Waldorf, Md.

CUSTOMER ORDER NO.	DATE SHIPPED/ MAILED.	DDI JOB NO. / DDI P.O. NO. / DIVISIONAL JOB NO.	SALESMAN	TERMS
	4/19/80	DDI JOB NO. 1698 / 10595	SR	NET—30

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
	RE: PRINTING SERVICES, LETTERS.		
54 M	2 sheet letters, with 2 color face and back .	23.97/M	$ 1,294.
	Authors Alterations:		
	Line shots:		4.
	Labor: stripping:		36
	TOTAL INVOICE:		$1,334.

8302401208

4-30-80 AK mails RFP Cks

1,01[illegible]

[illegible]

PINK—DDI CHRONOLOGICAL

Exhibit P-15

Diversified Direct, Inc.

INVOICE

2936 Prosperity Avenue • Fairfax (Merrifield), Virginia 22031 • (703) 573-1605

Remit to: DIVERSIFIED DIRECT, INC., c/o U.V.B. BOX 179, ALEXANDRIA, VA 22314

NO. A 1937

DATE April 21, 1

TO:

Reagan for President
c/o Cheryl Swaim
435 N. Lee Street
Alexandria, Va. 22314

SHIPPED TO:

DMS
Waldorf, Md.

CUSTOMER ORDER NO.	DATE SHIPPED/MAILED.	DDI JOB NO. / DDI P.O. NO. / DIVISIONAL JOB NO.	SALESMAN	TERMS
	4/19/80	1867 / 10584	SX	NET-30

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
	RE: PRINTING SERVICES, NEWSPAPER CLIPPINGS.		
108 M	Newspaper clippings, with 1 color face and blank backs.	8.80/M	950.40
	TOTAL INVOICE:		$950.40

830420 08

OK

4-30-80
17th mailing
RFP
cut

12.1 - 1 - 1 - 5%
+ 729 - 104
$17,527

Exhibit F-20

Diversified Direct, Inc.

INVOICE

2936 Prosperity Avenue · Fairfax (Merrifield), Virginia 22031 · (703) 573-1605

Remit to: DIVERSIFIED DIRECT, INC., c/o U.V.B. BOX 179, ALEXANDRIA, VA 22314

NO. A 1964

DATE April 22, 198

TO:

Reagan for President
c/o Black, Manafort & Stone, Inc.
435 N. Lee St.
Alexandria, Va. 22314
Attn: Cheryl Swaim

SHIPPED TO:

Wiland & Assoc.

CUSTOMER ORDER NO.	DATE SHIPPED/ MAILED.	DDI JOB NO. / DDI P.O. NO. / DIVISIONAL JOB NO.	SALESMAN	TERMS
	4/20/80	1866 / 10594	SK	NET—30

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
	RE: PRINTING SERVICES, COMPUTER FORMS.		
57 M	Computer forms, with 2 color face and 2 color back.	17.41/M	992.37
	Authors Alterations:		
	Line shots:		4.00
	Labor: stripping:		36.00
	Blueline and color sep.		19.50
			1,051.87
	4% Va. tax:		42.07
	TOTAL INVOICE:		$1,093.94

8304208

4-30-80
17H makes
RFP
CH

WHITE—CLIENT GREEN—REMITTANCE CANARY—ACCOUNTING PINK—DDI CHRONOLOGICAL

Exhibit P-27

Address Correction Requested

FROM: Mrs. Beatrice Shortliffe
2115 58th St
Sacramento, California 958

1634 NUUANU AVE #208.
HONOLULU HI 96817

8304042085 6

Exhibit F-27

8304042085 7

Dear Friend and Supporter:

You and I are on a winning streak.

If you have followed it in the news, you know that thanks to the dedication and support of people like you our campaign has swept the early primaries.

We have won over 400 delegates, almost one-half of the number needed to be nominated at the Republican National Convention this summer.

Never before have our chances of electing a conservative Republican President been better.

I am absolutely positive that with your continued help, we can go on to win the Republican nomination and beat Jimmy Carter or Teddy Kennedy in the fall.

There is one thing that deeply disturbs me. Although we have won every major contest so far our campaign funds have trickled off to almost nothing. I am enclosing a clipping from the Washington Post that details this dire situation. Our campaign treasurer, Bay Buchanan, reports that we currently have less than $10,000 on hand.

In the next three weeks we must lay out $199,000 for voter mailings, radio and television time and the expenses of my travelling to the middle and late primary states.

I hate like the dickens to ask you because you have been so generous to me in the past.

But I would deeply appreciate it if you could help us raise the $199,000.

Your check for $10 or $15 or $25 would go a long

way toward meeting our goal.

Everywhere I go in this country, I feel a spirit of hope and optimism about America's future. It is time to rebuild America's military strength and restore economic prosperity and opportunity at home.

The politicians say it can't be done. But I believe with your help we can balance the budget, we can cut taxes, we can create jobs and we can restore America's strength and prestige abroad.

I'm counting on you. I need your help.

Together you and I can make this a year of victory not only for our campaign but also for the American people.

Our financial situation is as urgent as I have stated to you. I know you share my dream for the future of our country. Please don't put this letter aside until you have acted.

With deepest appreciation for your past support.

Sincerely,

RONALD REAGAN

P.S. The Texas and California primaries are right around the corner. Our opponents are waiting for us to run out of money or make a serious campaign mistake. With your help, we will avoid these pitfalls and go on to victory. Please let me hear from you today.

8304042083E

TO: Governor Ronald Reagan.

FROM: Mr. Christian L Bendixen
98 400 Komuka Lp No 419
Aiea, Hawaii 96701

PRV 96701BNDX098 CMB

8304042085S

Dear Governor Reagan,

I understand the campaign money situation is urgent. We *must* win the Republican nomination and I am willing to help.

Enclosed is my maximum contribution of:

☐ $10 ☐ $15 ☐ $25 ☐_____ Other

towards the $199,000 we need to raise immediately. PLEASE MAKE YOUR CHECK PAYABLE TO REAGAN FOR PRESIDENT.

I understand the following information is required by Federal law:

Occupation _____

Place of Business _____

City/State _____

This solicitation is on behalf of REAGAN FOR PRESIDENT [illegible] 9841 Airport Blvd., Suite 1430, Los Angeles, California 90045
REAGAN FOR PRESIDENT Committee, Paul Laxalt, Chairman, Ray Buchanan, Treasurer
A copy of our report is filed with and available for purchase from the Federal Election Commission, Washington, D.C. 20463

Exhibit G-1

Diversified Direct, Inc.

INVOICE

2936 Prosperity Avenue · Fairfax (Merrifield), Virginia 22031 · (703) 573-1605

Remit to: DIVERSIFIED DIRECT, INC., c/o U.V.B. BOX 179, ALEXANDRIA, VA 22314

NO. A 1919

DATE April 15, 1980

TO:

National Conservative Political
Action Committee
1500 Wilson Blvd.
Arlington, Va. 22209

SHIPPED TO:

DMS
Waldorf, Md.

CUSTOMER ORDER NO.	DATE SHIPPED/ MAILED.	DDI JOB NO. / DDI P.O. NO. / DIVISIONAL JOB NO.	SALESMAN	TERMS
C788 NCPAC 7269	4/10/80	1692 10563	SE	NET—30

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
	RE: PRINTING SERVICES, POSTCARDS.		
348 M	Postcards, with 2 color face and 1 color back.	4.35/M	1,513.80
	TOTAL INVOICE:		$1,513.80

7,000 305.85 — 87D

-7,000 305.85 — 87W1

-24,000 896.10 — 20D

524 C IE Reagan

[33/5D

8304042085

WHITE—CLIENT · GREEN—REMITTANCE · CANARY—ACCOUNTING · PINK—DDI CHRONOLOGICAL
GOLDENROD—DDI JOB JACKET

C789

PURCHASE ORDER

Exhibit G-3

O. NO. NCPAC-7269

ATE April 3, 1980

ATE REQUIRED April 10-11, 1980

BILL TO
National Conservative Political Action Committee
1500 Wilson Boulevard, #513
Arlington, Virginia 22209

SUPPLIER
Diversified Direct, Inc.
2936 Prosperity Avenue
Merrifield, Va.

SHIP TO
Diversified Mailing Services
Acton Lane
Waldorf, Md.

ACCOUNT NCPAC/House&Prospect/Bufkin-Taylor/Mail Codes 87W, W1, 200

SPECIAL INSTRUCTIONS

1. All invoices must be accompanied by 2 samples.
2. Bill direct to the client named above. By accepting and fulfilling this purchase order the supplier expressly acknowledges and agrees that this purchase order is to be charged against the account of the client named above, and that the client named above shall be solely responsible for the payment of any invoice arising out of this purchase order.
3. Blueline IS required, unless otherwise specified.
4. 25 samples to RAVCO Production office prior to or no later than delivery date.
5. Please notify us immediately if you are unable to ship complete order by 5 p.m. of specified delivery date.
6. Each package, box or skid must be marked according to special instructions on face of purchase order. If packaging instructions do not appear on purchase order please contact ASR.
7. No changes will be binding on client listed on this P.O. unless written authorization is given.
8. All Freight charges are to be prepaid (at vendors expense, to be included in Bid).
9. No under runs will be accepted. Acceptable over runs are as follows:

5M-10M	15%	50M-100M	4%
10M-25M	10%	Over 100M	2%
25M-50M	6%		

QUANTITY ORDERED	QUANTITY RECEIVED	PLEASE SUPPLY ITEMS LISTED BELOW	UNIT PRICE	TOTAL
830400		ITEM: Postcard coded PW7 Size: 3 1/2" x 5 1/2" Stock: ~~[illegible]~~ 75lb. Hi-bulk white Ink: PMS 185 Red and Black Prints: 2/1 Blueline required Please return camera ready art and provide 10 samples to production dept. upon completion of job.	$4.35/M	TOTAL: $1513.80

ACCOUNT REP

IMPORTANT: OUR PURCHASE ORDER NUMBER AND JOB NUMBER MUST APPEAR ON INVOICES, PACKAGES AND CORRESPONDENCE. INVOICE IN TRIPLICATE. TERMS AND CONDITIONS OF THIS PURCHASE: SEE SPECIAL INSTRUCTIONS ABOVE.

L. Titlow
PURCHASING AGENT

FOR OFFICE USE ONLY:	DATE(S) RECEIVED	DATE ORDER COMPLETED	SUPPLIER WORK NO.	SUPPLIER INVOICE NO.	SUPPLIER INVOICE DATE
QUANTITY RECEIVED					

ADDITIONAL INFORMATION:
Smith- no bid does not have enough stock, Preps$4.95

Exhibit G-3

Place Stamp Here

Governor Ronald Reagan
9841 Airport Blvd., #1430
Los Angeles, CA 90045

FIRST CLASS

8304041208522

Dear Governor Reagan:

I understand Federal Election Law prohibits your campaign from spending the funds you need in remaining crucial primary states.

I wanted to let you know that I am making a personal contribution today to an independent campaign on your behalf sponsored by the National Conservative Political Action Committee.

Please accept my best wishes in your campaign for the President. I am behind you 100%.

Sincerely,

PWT

Exhibit G-4

Diversified Direct, Inc.

INVOICE

2936 Prosperity Avenue · Fairfax (Merrifield), Virginia 22031 · (703) 573-4605

Remit to: DIVERSIFIED DIRECT, INC., c/o U.V.B. BOX 179, ALEXANDRIA, VA 22314

NO. A 1913

DATE April 15, 1980

TO:

National Conservative Political
Action Committee
1500 Wilson Blvd,
Arlington, Va. 22209

SHIPPED TO:

DMS
Waldorf, Md.

CUSTOMER ORDER NO.	DATE SHIPPED/ MAILED.	DDI JOB NO. / DDI P.O. NO. / DIVISIONAL JOB NO.	SALESMAN	TERMS
C788 NCPAC 7271	4/15/80	1691 10567	SE	NET—30

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
	RE: PRINTING SERVICES, ADS.		
348 M	Reagan ads, with 1 color face on 1 side only.	8.97/M	3,121.56
	TOTAL INVOICE:		$3,121.56

7,500 / 1,156.87 — 11,500 / 1,156.87 — 26,000 / 1547.82 — Total 1,600.00

8760 - 8760i - 20D

1,521.56

#524 C II Reagan

62.43

9504120805

PURCHASE ORDER

C788

Exhibit 9

P.O. NO. NCPAC- 7271

DATE April 3, 1980

DATE REQUIRED April 8, 1980

BILL TO
National Conservative Political Action Committee
1500 Wilson Boulevard, #513
Arlington, Virginia 22209

SUPPLIER
Diversified Direct, Inc.
2936 Prosperity Avenue
Merrifield, Va.

SHIP TO
Diversified Mailing Services
Acton Lane
Waldorf, Md.

ACCOUNT NCPAC/House-Prospect/Bufkin-Taylor/Mail Codes 67H, H1, 20D

SPECIAL INSTRUCTIONS

1. All invoices must be accompanied by 2 samples.
2. Bill direct to the client named above. By accepting and fulfilling this purchase order the supplier expressly acknowledges and agrees that this purchase order is to be charged against the account of the client named above, and that the client named above shall be solely responsible for the payment of any invoice arising out of this purchase order.
3. Blueline IS required, unless otherwise specified.
4. 25 samples to RAVCO Production office prior to or no later than delivery date.
5. Please notify us immediately if you are unable to ship complete order by 5 p.m. of specified delivery date.
6. Each package, box or skid must be marked according to special instructions on face of purchase order. If packaging instructions do not appear on purchase order please contact ASR.
7. No changes will be binding on client listed on this P.O. unless written authorization is given.
8. All Freight charges are to be prepaid (at vendors expense, to be included in Bid).
9. No under runs will be accepted. Acceptable over runs are as follows:

5M-10M	15%	50M-100M	4%
10M-25M	10%	Over 100M	2%
25M-50M	6%		

QUANTITY ORDERED	QUANTITY RECEIVED	PLEASE SUPPLY ITEMS LISTED BELOW	UNIT PRICE	TOTAL
830402		ITEM: Reagan Ad coded FW7		
		Size: 8" x 10"		
3[illegible],00		Stock: ~~[illegible]~~ 50lb white offset	$8.97M	
		Ink: Black		
		Prints: 1/0 (1 20% screen black)		
		Fold into equal thirds, head out		
		Blueline required		
		Please return camera ready art and provide 10 samples to production dept. upon completion of job.		
			TOTAL:	$3121.56M

ACCOUNT REP

IMPORTANT: OUR PURCHASE ORDER NUMBER AND JOB NUMBER MUST APPEAR ON INVOICES, PACKAGES AND CORRESPONDENCE. INVOICE IN TRIPLICATE. TERMS AND CONDITIONS OF THIS PURCHASE: SEE SPECIAL INSTRUCTIONS ABOVE.

PURCHASING AGENT L. Witlow

FOR OFFICE USE ONLY:	DATE(s) RECEIVED	DATE ORDER COMPLETED	SUPPLIER WORK NO.	SUPPLIER INVOICE NO.	SUPPLIER INVOICE DATE

QUANTITY RECEIVED

ADDITIONAL INFORMATION

Smith $9.53, M, Prep $ 10.20M

Diversified Direct, Inc.

INVOICE Exhibit 9-

36 Prosperity Avenue - Fairfax (Merrifield), Virginia 22031 - (703) 573-1605

mittor: DIVERSIFIED DIRECT, INC., c/o U.V.B. BOX 179, ALEXANDRIA, VA 22314

No. A 1942

DATE April 15, 1980

TO:

National Political Action Committee.
1500 Wilson Blvd. Suite 513
Arlington, Va. 22209

SHIPPED TO:

RAVCO

USTOMER C788 RDER NO. NCPAC 7270	DATE SHIPPED/ MAILED. 4/10/80	DDI JOB NO. 1681 DDI P.O. NO. 10562 DIVISIONAL JOB NO.	SALESMAN SE	TERMS NET—30

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
	RE: PRINTING SERVICES, COMPUTER LETTERS.		
205 M	Comp. letters with 1 color face and 1 color back. Codedi: L 20 D.	16.38/M	3,357.90
143 M	Comp letters same specs. Codedi: LW7	16.38/M	2,342.34
			5,700.24
	4% Va. tax:		228.00
	TOTAL INVOICE:		$5,928.24

8730 40 Exhibit 5

870 - 8701 = 524 · C · Lt. Reagan

WHITE—CLIENT GREEN—REMITTANCE CANARY—ACCOUNTING PINK—DDI CHRONOLOGICAL

GOLDENROD—DDI JOB JACKET

Exhibit G-7

Urgentgram

Response Requested by

From:

To:

URG

URGENT REPLY REQUESTED NO LATER THAN

8304042086 6

Authorized and paid for by the National Conservative Political Action Committee

Exhibit G-7

Urgentgram

Response Requested by

From:

To:

8304042086 7

Urgentgram

URGENT REPLY REQUESTED NO LATER THAN

IN POPULARITY. REAGAN WILL LOSE VALUABLE MOMENTUM IF HE CANNOT MAINTAIN HIS CAMPAIGN ADVERTISING PROGRAM IN HIGH GEAR IN THE MAY-JUNE PRIMARIES. CARTER CAN PULL AHEAD BECAUSE OF THE FREE ADVERTISING HE GETS AS A SITTING PRESIDENT.

NCPAC HAS AND WILL RUN "INDEPENDENT" PRO-REAGAN ADS TO MAKE SURE THIS DOES NOT HAPPEN.

I AM CONVINCED RONALD REAGAN IS A DEDICATED CONSERVATIVE WHO WILL HELP TURN THIS COUNTRY AROUND IF ELECTED.

BUT, ASIDE FROM THIS, I AM DETERMINED TO HELP GOVERNOR REAGAN NOW FOR TWO REASONS:

1. WHEN NCPAC WAS FOUNDED IN 1976 RONALD REAGAN SIGNED A LETTER PERSONALLY ASKING HIS SUPPORTERS AND OTHER CONSERVATIVES ALL OVER THE COUNTRY TO HELP US. IN FACT NCPAC WAS THE ONLY ORGANIZATION RONALD REAGAN HELPED IN 1976.

   MANY THOUSANDS OF CONSERVATIVES RESPONDED TO HIS CALL. HE IS ONE OF THE MAIN REASONS NCPAC IS HERE TODAY WITH A 71% WIN RECORD AGAINST THE LIBERALS.

2. AN OVERWHELMING MAJORITY OF NCPAC SUPPORTERS--PERHAPS YOU WERE ONE--WHO WERE CONTACTED WITH OUR "1980 PRESIDENTIAL SURVEY" SAID REAGAN WAS THEIR NUMBER ONE CHOICE FOR PRESIDENT.

NOW GOVERNOR REAGAN NEEDS OUR HELP.

THE ADS WE PRODUCE WILL BE TOUGH, HARD-HITTING ADS THAT WILL EXPOSE CARTER'S WEAKNESSES AS WELL AS PROMOTE REAGAN.

THESE ADS WILL BE PRODUCED BY TOP NOTCH PROFESSIONALS. THEY TALK ABOUT CARTER'S WEAK HANDLING OF IRAN, INFLATION ETC. AND HOW REAGAN WOULD BE A MUCH BETTER PRESIDENT.

WE WILL RUN THESE ADS IN MAJOR CITIES AND PLACES WHERE MANY VOTERS WILL BE MAKING UP THEIR MINDS BETWEEN CARTER AND REAGAN IN THE NEXT TWO MONTHS.

IF YOU CAN SEND A CONTRIBUTION TO NCPAC TO HELP US HELP GOVERNOR REAGAN, I AM ALSO ASKING YOU TO SEND HIM THE ENCLOSED POSTCARD TELLING HIM OF YOUR SUPPORT.

THE POSTCARDS YOU AND OTHER CONSERVATIVES SEND IN WILL GO TO GOVERNOR REAGAN'S CAMPAIGN HEADQUARTERS. HIS STAFF WILL SEE THE DEEP LEVEL OF SUPPORT GOVERNOR REAGAN HAS WITH CONSERVATIVES LIKE YOU.

WILL YOU PLEASE SEND YOUR LARGEST POSSIBLE CONTRIBU-

8304042086

1/83

PURCHASE ORDER

Exhibit 6-8

NO. NCPAC-7270

DATE April 3, 1980

DATE REQUIRED ~~April 9, 1980~~

SHIP TO National Conservative Political Action Committee
1500 Wilson Boulevard, #513
Arlington, Virginia 22209

SUPPLIER
Diversified Direct, Inc.
2936 Prosperity Avenue
Merrifield, Va.

BILL TO The Viguerie Company
Computer Division

ACCOUNT NCPAC/House-Prospect/Bufkin-Taylor/Mail Codes 87W, 87, 20D

SPECIAL INSTRUCTIONS

1. All invoices must be accompanied by 2 samples.
2. Bill direct to the client named above. By accepting and fulfilling this purchase order the supplier expressly acknowledges and agrees that this purchase order is to be charged against the account of the client named above, and that the client named above shall be solely responsible for the payment of any invoice arising out of this purchase order.
3. Blueline IS required, unless otherwise specified.
4. 25 samples to RAVCO Production office prior to or no later than delivery date.
5. Please notify us immediately if you are unable to ship complete order by 5 p.m. of specified delivery date.
6. Each package, box or skid must be marked according to special instructions on face of purchase order. If packaging instructions do not appear on purchase order please contact ASR.
7. No changes will be binding on client listed on this P.O. unless written authorization is given.
8. All Freight charges are to be prepaid (at vendors expense, to be included in Bid).
9. No under runs will be accepted. Acceptable over runs are as follows:

5M-10M	15%	50M-100M	4%
10M-25M	10%	Over 100M	2%
25M-50M	8%		

QUANTITY REQUIRED	QUANTITY RECEIVED	PLEASE SUPPLY ITEMS LISTED BELOW	UNIT PRICE	TOTAL
830400		ITEM: Computer Letter/Reply coded L-W7 and L-200 *		
		Size: 11" x 14 7/8" (FOR 3500 LASER)		
		Ink: PMS 293 Blue and Black	$16.38/M	
		Prints: 1/1 (blue over black, blank left and right)		
		Blueline required		
		Stock: 50 lb white offset		
		Please return camera ready art and provide 10 samples to production upon completion of job.		
		2 versions		
		# I - L-200 -- 205,000		
		# II - L-W7 — 143,000		
		Wire to Alice	TOTAL:	$5700.24

ACCOUNT REP

IMPORTANT: OUR PURCHASE ORDER NUMBER AND JOB NUMBER MUST APPEAR ON INVOICES, PACKAGES AND CORRESPONDENCE. INVOICE IN DUPLICATE. TERMS AND CONDITIONS OF THIS PURCHASE: SEE SPECIAL INSTRUCTIONS ABOVE.

L. Tichy
PURCHASING AGENT

OFFICE ONLY:	DATE(S) RECEIVED	DATE ORDER COMPLETED	SUPPLIER W.O. NO.	SUPPLIER INVOICE NO.	SUPPLIER INVOICE DATE

QUANTITY RECEIVED

ADDITIONAL INFORMATION

Colorgraphics $37.75/M, metro $32.50 - [illegible] del.

Exhibit G-9

Diversified Direct, Inc.

INVOICE A2059

6 Prosperity Avenue • Fairfax (Merrifield), Virginia 22031 • (703)-573-4605

mit to: DIVERSIFIED DIRECT, INC., c/o U.V.B. BOX 179, ALEXANDRIA, VA 22314

NO. [redacted]

DATE May 19, 1980

TO:

National Conservative Political
Action Committee
1500 Wilson Blvd. #513
Arlington, Va. 22209

SHIPPED TO:

RAVCO

STOMER CB33L RDER NO. NCPAC 8105	DATE SHIPPED/ MAILED. 5/16/80	DDI JOB NO. 1536 DDI P.O. NO. DIVISIONAL JOB NO. 10699	SALESMAN SE	TERMS NET—30

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
	RE: PRINTING SERVICES, COMPUTER FORMS.		
28 M	Computer forms, with 2 color face and black back. Coded: L21A.	38.66/M	1082.48
	4% Va. tax:		43.29
	TOTAL INVOICE:		$1125.77

#534C
IE Reagan

WHITE—CLIENT GREEN—REMITTANCE CANARY—ACCOUNTING PINK—DDI CHRONOLOGICAL

PURCHASE ORDER

C833L

NO. NCPAC- 8105

May 5, 1980

REQUIRED May 16, 1980

TO National Conservative Political Action Committee
1500 Wilson Boulevard, #513
Arlington, Virginia 22209

PLIER

— DDI
2936 Prosperity Ave.
Merrifield, Va

P TO The Viguerie Company
Computer Division

CCUNT NCPAC/Prospect/Bufkin-Taylor/Mail Codes 20H3, 21A, 20J

SPECIAL INSTRUCTIONS

1. All invoices must be accompanied by 2 samples.
2. Bill direct to the client named above. By accepting and fulfilling this purchase order the supplier expressly acknowledges and agrees that this purchase order is to be charged against the account of the client named above, and that the client named above shall be solely responsible for the payment of any invoice arising out of this purchase order.
3. Blueline IS required, unless otherwise specified.
4. 25 samples to RAYCO Production office prior to or no later than delivery date.
5. Please notify us immediately if you are unable to ship complete order by 5 p.m. of specified delivery date.
6. Each package, box or skid must be marked according to special instructions on face of purchase order. If packaging instructions do not appear on purchase order please contact ASR.
7. No changes will be binding on client based on this P.O. unless written authorization is given.
8. All Freight charges are to be prepaid (at vendors expense, to be included in Bid).
9. No under runs will be accepted. Acceptable over runs are as follows:

5M-10M	15%	50M-100M	4%
10M-25M	10%	Over 100M	2%
25M-50M	6%		

QUANTITY RECEIVED	PLEASE SUPPLY ITEMS LISTED BELOW	UNIT PRICE	TOTAL
	ITEM: Computer Letters, 1-up FD, coded L-21A		
	Size: 17" x 11" (for 3211 printer)		
	Stock: ~~[illegible]~~ 50 lb white offset	$44.50	
	Ink: PMS 287 Blue and Black		
	Prints: 2/1		
	Blueline required		
	Please return camera-ready art and provide 10 samples to production dept. upon completion of job.		
		TOTAL	$1,246.00

ACCOUNT REP

IMPORTANT: OUR PURCHASE ORDER NUMBER AND JOB NUMBER MUST APPEAR ON INVOICES, PACKAGES AND CORRESPONDENCE. INVOICE INDICATE TERMS AND CONDITIONS OF THIS PURCHASE. SEE SPECIAL INSTRUCTIONS ABOVE.

Sandy Sperger — PURCHASING AGENT

OFFICE USE ONLY	DATE(S) RECEIVED	DATE ORDER COMPLETED	SUPPLIER WORK NO.	SUPPLIER INVOICE NO.	SUPPLIER INVOICE DATE

QUANTITY RECEIVED

ColorGraphics-52.29

FINAL INSPECTION

Diversified Direct, Inc.

INVOICE 12036 Exhibit G-11

3o Prosperity Avenue · Fairfax (Merrifield), Virginia 22031 · (703) 573-1605

mit to: DIVERSIFIED DIRECT, INC., c/o U.V.B. BOX 179, ALEXANDRIA, VA 22314

INVOICE NO.

DATE May 12, 1980

TO:

National Conservative Political
Action Committee
1500 Wilson Blvd.
Suite 513
Arlington, Va.

SHIPPED TO:

RAVCO

USTOMER ORDER NO.	DATE SHIPPED/ MAILED.	DDI JOB NO. / DDI P.O. NO. / DIVISIONAL JOB NO.	SALESMAN	TERMS
C832C, NCPAC 8096	5/12/80	1507 / 10683	JM	NET—30

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
	RE: PRINTING SERVICES, COMPUTER FORMS.		
.61 M	Computer forms, with 2 color face and black back. Coded: LC8.	25.38/M	1548.18
	4% Va. tax:		61.92
	TOTAL INVOICE:		$1610.10

8304042087

#524D

WHITE—CLIENT GREEN—REMITTANCE CANARY—ACCOUNTING PINK—DDI CHRONOLOGICAL
GOLDENROD—DDI JOB JACKET

CAPITOL WIRE SERVICE

P.O. Box 877
Ben Franklin Sta.
Washington, D.C. 20044

Repeat Message ☒ Yes ☐ No	Operator I.D. # 64105	Request confirming copy to sender via U.S. Mail ☒ Yes ☐ No
Line Count: 62	Payment: ☒ Cash ☐ Charge ☐ Collect	

CLASSIFICATION
☐ Standard Wiregram
☐ Night Letter
☒ Emergency Wire

Send the following message to the individual above.

PLEASE CONTACT ME IMMEDIATELY. ☎—

I WAS JUST NOTIFIED YOUR NAME APPEARS ON LIST OF THOSE WHO HAVE NOT SENT 1980 CONTRIBUTION TO NATIONAL CONSERVATIVE POLITICAL ACTION COMMITTEE.

I AM DISAPPOINTED TO SEE YOUR NAME NOT ON INACTIVE LIST. I KNOW PERSONALLY YOU HAVE BEEN GENEROUS CONTRIBUTOR TO NCPAC IN THE PAST.

IT IS ESPECIALLY DISAPPOINTING TO ME ALSO BECAUSE THE 1980 ELECTIONS MAY BE THE MOST CRUCIAL IN RECENT HISTORY.

RIGHT NOW, THESE VITAL NCPAC PROJECTS NEED YOUR HELP:

1) TARGET '80—THIS IS OUR PLAN TO DEFEAT THE FIVE MOST LIBERAL MEN IN THE U.S. SENATE: GEORGE MCGOVERN, ALAN CRANSTON, BIRCH BAYH, JOHN CULVER, AND FRANK CHURCH.

   OUR POLLS SHOW EACH OF THESE LIBERALS IS NOW BEATABLE BUT WE MUST KEEP UP THE PRESSURE TO HAVE A REAL CHANCE TO DEFEAT THEM IN NOVEMBER.

   REMEMBER, WE ONLY NEED TO DEFEAT 10 LIBERAL

8304042087

DEMOCRATS IN ALL FOR THE REPUBLICANS TO ACTUALLY TAKE OVER THE SENATE.

BUDGET $400,000

2) PRO-REAGAN ADS-REAGAN HELPED NCPAC GET STARTED IN 1975. I AM DETERMINED TO HELP HIM NOW. WE MUST SEIZE THIS OPPORTUNITY TO ELECT A REAL CONSERVATIVE PRESIDENT. UNFORTUNATELY THE REAGAN CAMPAIGN IS ALMOST OUT OF MONEY. BUT NCPAC CAN BUY AND RUN ADS INDEPENDENT OF HIS CAMPAIGN. THESE ADS WILL EXPOSE CARTER'S WEAKNESSES AS WELL AS HELP REAGAN.

BUDGET $559,000

3) CONGRESSIONAL PROJECT-DOZENS OF GOOD CONSERVATIVES ARE RUNNING FOR CONGRESS ACROSS THE COUNTRY WHO NEED OUR HELP. IF THEY CAN GET THE SUPPORT THEY NEED FROM NCPAC WE COULD ELECT A MAJORITY OF CONSERVATIVE DEMOCRATS AND REPUBLICANS TO CONGRESS THIS YEAR.

BUDGET $403,000

RECEIVED MAY 21 1980

YOU CAN SEE WHY 1980 IS SO IMPORTANT. AND WHY I AM SO DISAPPOINTED WE HAVE NOT HEARD FROM YOU.

IMPORTANT YOU KNOW WHOLE SITUATION: AS OF APRIL 1ST NCPAC IS NEARLY 50% BELOW BUDGET. I FEAR MANY CONTRIBUTORS, LIKE YOU, WAITING TO SEND MONEY CLOSER TO ELECTIONS. BUT FUNDS SPENT RIGHT NOW MOST EFFECTIVE IN SWAYING PUBLIC OPINION TO CONSERVATIVES. MONEY SPENT THIS FALL WILL BE MUCH LESS IMPORTANT.

FAILURE TO RENEW YOUR FINANCIAL SUPPORT NOW MEANS MAJOR SETBACK FOR CONSERVATIVE ELECTION VICTORY IN 1980.

MY GRAVEST CONCERN RIGHT NOW IS RAPID DETERIORATION OF U.S. ECONOMY AND DEFENSE STRENGTH. CARTER ADMINISTRATION AND LIBERAL DOMINATED CONGRESS TOGETHER HAVE FAILED TO COUNTER GROWING SOVIET MI[illegible] AND POLITICAL EXPANSIONISM AROUND THE WORLD.

NCPAC MUST DIRECT ALL EFFORTS, ALL RESOURCES TO ELECT A CONSERVATIVE PRESIDENT, SENATE AND HOUSE.

STOPPING U.S. SOCIALISTIC TREND DEPENDS ON THESE 1980 ELECTIONS.

MY ONLY HOPE IS FOR YOU TO RESPOND NOW TO MY EMERGENCY WIRE AND SEND BACK YOUR GENEROUS CONTRIBUTION IMMEDIATELY. YOUR RENEWAL CONTRIBUTION ESSENTIAL TO CONSERVATIVE SUCCESS. UNLESS FORMER NCPAC SUPPORTERS LIKE YOU CONTRIBUTE VITAL

8304042087

C832C,6

PURCHASE ORDER

Exhibit G-12

NO. NCPAC-8096

TE May 1, 1980

TE REQUIRED May 9, 1980

LL TO National Conservative Political Action Committee
1500 Wilson Boulevard, #513
Arlington, Virginia 22209

UPPLIER
DDI
2936 Prosperity Ave
Merrifield, VA

HIP TO The Viguerie Company
Computer Division

CCOUNT NCPAC/House/Buffin-Taylor/Mail Codes 83C, D

SPECIAL INSTRUCTIONS

1. All invoices must be accompanied by 2 samples.
2. Bill direct to the client named above. By accepting and fulfilling this purchase order the supplier expressly acknowledges and agrees that this purchase order is to be charged against the account of the client named above, and that the client named above shall be solely responsible for the payment of any invoice arising out of this purchase order.
3. Blueline IS required, unless otherwise specified.
4. 25 samples to RAVCO Production office prior to or no later than delivery date.
5. Please notify us immediately if you are unable to ship complete order by 5 p.m. of specified delivery date.
6. Each package, box or skid must be marked according to special instructions on face of purchase order. If packaging instructions do not appear on purchase order please contact ASR.
7. No changes will be binding on client listed on this P.O. unless written authorization is given.
8. All Freight charges are to be prepaid (at vendors expense, to be included in Bid).
9. No under runs will be accepted. Acceptable over runs are as follows:

5M-10M	15%	50M-100M	4%
10M-25M	10%	Over 100M	2%
25M-50M	6%		

QUANTITY ORDERED	QUANTITY RECEIVED	PLEASE SUPPLY ITEMS LISTED BELOW	UNIT PRICE	TOTAL
830420		ITEM: Computer Letters coded L-C9 Size: 17" x 11" Stock: 50 lb ~~Canary~~ offset Ink: PMS 185 Red and Black Prints: 2/1 Blueline required Please return camera ready art and provide 10 samples to production dept. upon completion of job.	$25.38	
			TOTAL	$1,548.18

ACCOUNT REP

ORTANT: OUR PURCHASE ORDER NUMBER AND JOB NUMBER MUST EAR ON INVOICES, PACKAGES AND CORRESPONDENCE. INVOICE IN PLICATE. TERMS AND CONDITIONS OF THIS PURCHASE: SEE SPECIAL TRUCTIONS ABOVE.

Sandy Sperger
PURCHASING AGENT

OFFICE E ONLY	DATE(s) RECEIVED	DATE ORDER COMPLETED	SUPPLIER WORK NO.	SUPPLIER INVOICE NO.	SUPPLIER INVOICE DATE

NTITY RECEIVED

ColorGraphics-48.92

TIONAL INFORMATION

1710
Exhibit G-13

June 20, 19[illegible]

PAY TO THE ORDER OF N.C.P.A.C. $5454.36 DOLLARS

Diversified Direct, Inc.
c/o UVB Box 179
Alexandria, VA 22314

NOT NEGOTIABLE

DESCRIPTION	AMOUNT
For payment of invoices: #A2025, A2024, A2035, A2034, A2059	$5454.36
#524C IE McGovern $543.70 #524C IE Bayh $543.70 #524C IE Church $543.70 #524C IE Culver $543.70 #524C IE Cranston $543.69 #524C IE Reagan $1125.77 #524D $1610.10	

Exhibit G-14

Diversified Direct, Inc.

INVOICE A2061

2936 Prosperity Avenue • Fairfax (Merrifield), Virginia 22031 • (703) 573-1605

Remit to: DIVERSIFIED DIRECT, INC., c/o U.V.B. BOX 179, ALEXANDRIA, VA 22314

No. [redacted]

DATE May 19, 1980

TO:

National Conservative Political
Action Committee
1500 Wilson Blvd. #513
Arlington, Va. 22209

SHIPPED TO:

RAVCO

CUSTOMER ORDER NO.	DATE SHIPPED/ MAILED.	DDI JOB NO. / DDI P.O. NO. / DIVISIONAL JOB NO.	SALESMAN	TERMS
C833e,f NCPAC 8103	5/14/80	1518 / 10687	SE	NET—30

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
	RE: PRINTING SERVICES, COMP. FORMS.		
444 M	Computer forms, with 1 color face and back. Code: L20H.	17.02/M	7556.88
	4% Va. tax:		302.27
	TOTAL INVOICE:		$7859.15
	6/3 Partial ←		3200.00
	7/3 partial		2220.00
	7/11		600.00

#524C
IE Reagan

9304042087 7

WHITE—CLIENT GREEN—REMITTANCE CANARY—ACCOUNTING PINK—DDI CHRONOLOGICAL

PURCHASE ORDER

Exhibit G-15

O. NO NCPAC-8103

ATE May 7, 1980

ATE REQUIRED May 12, 1980

BILL TO
National Conservative Political Action Committee
1500 Wilson Boulevard, #513
Arlington, Virginia 22209

SUPPLIER
DDI
2936 Prosperity Ave.
Merrifield, Va

SHIP TO
The Viguerie Company
Computer Division

ACCOUNT NCPAC/Prospect/Bufkin-Taylor/Mail Codes 20H, H1, H2, H4, 20H+

SPECIAL INSTRUCTIONS

1. All invoices must be accompanied by 2 samples.
2. Bill direct to the client named above. By accepting and fulfilling this purchase order the supplier expressly acknowledges and agrees that this purchase order is to be charged against the account of the client named above, and that the client named above shall be solely responsible for the payment of any invoice arising out of this purchase order.
3. Blueline IS required, unless otherwise specified.
4. 25 samples to RAVCO Production office prior to or no later than delivery date.
5. Please notify us immediately if you are unable to ship complete order by 5 p.m. of specified delivery date.
6. Each package, box or skid must be marked according to special instructions on face of purchase order. If packaging instructions do not appear on purchase order please contact ASR.
7. No changes will be binding on client listed on this P.O. unless written authorization is given.
8. All Freight charges are to be prepaid (at vendors expense, to be included in Bid).
9. No under runs will be accepted. Acceptable overruns are as follows:

5M-10M	15%	50M-100M	4%
10M-25M	10%	Over 100M	2%
25M-50M	6%		

QUANTITY ORDERED	QUANTITY RECEIVED	PLEASE SUPPLY ITEMS LISTED BELOW	UNIT PRICE	TOTAL
830,000		ITEM: Computer Letter/Replys coded L20H (FOR 3800 LASER) Size: 14 7/8" x 11" Stock: 50 lb canary offset Ink: Black Prints: 1/1 Bleeds left and right Blueline required Please return camera ready art and provide 10 samples upon completion of job.	$17.02¢	
			TOTAL	$7,556.88

ACCOUNT REP

IMPORTANT: OUR PURCHASE ORDER NUMBER AND JOB NUMBER MUST APPEAR ON INVOICES, PACKAGES AND CORRESPONDENCE. INVOICE IN TRIPLICATE. TERMS AND CONDITIONS OF THIS PURCHASE: SEE SPECIAL INSTRUCTIONS ABOVE.

Sand sparger S Sparger
PURCHASING AGENT

FOR OFFICE USE ONLY:	DATE(s) RECEIVED	DATE ORDER COMPLETED	SUPPLIER WORK NO.	SUPPLIER INVOICE NO.	SUPPLIER INVOICE DATE

QUANTITY RECEIVED

ColorTraphics – 22.37

ADDITIONAL INFORMATION

Exhibit G-10

Diversified Direct, Inc.

INVOICE

936 Prosperity Avenue - Fairfax (Merrifield), Virginia 22031 - (703) 573-1605

Remit to: DIVERSIFIED DIRECT, INC., c/o U.V.B. BOX 179, ALEXANDRIA, VA 22314

No. A 2095

DATE May 22, 1980

TO:

National Conservative Political
Action Committee
1500 Wilson Blvd.
Arlington, Va. 22209

SHIPPED TO:

RAVCO

CUSTOMER ORDER NO.	DATE SHIPPED/ MAILED.	DDI JOB NO. / DDI P.O. NO. / DIVISIONAL JOB NO.	SALESMAN	TERMS
C833G NCPAC 8158	5/21/80	1534 10701	SE	NET—30

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
	RE: PRINTING SERVICES, COMPUTER FORMS.		
218 M	Computer forms, with 1 color face and black back. Coded: L20G3.	20.43/M	4453.74
	4% Va. tax;		178.14
	TOTAL INVOICE:		$4631.88
		8/1	3400.00
			1,231.88

#524C
IE Reagan

Bal 8/8

8304042087

ORIGINAL—CLIENT 2ND COPY—FINANCE CANARY—ACCOUNTING PINK—DDI CHRONOLOGICAL

Exhibit G-17

Diversified Direct, Inc.

INVOICE

936 Prosperity Avenue - Fairfax (Merrifield), Virginia 22031 - (703) 573-1895

No. A 2178

Remit to: DIVERSIFIED DIRECT, INC., c/o U.V.B. BOX 179, ALEXANDRIA, VA 22314

DATE June 20, 1980

TO:

National Conservative Political
Action Committee
1500 Wilson Blvd. #513
Arlington, Va. 22209

SHIPPED TO:

RAVCO

CUSTOMER ORDER NO.	DATE SHIPPED/ MAILED.	DDI JOB NO. / DDI P.O. NO. / DIVISIONAL JOB NO.	SALESMAN	TERMS
C897	6/17/80	10823	SE	NET—30

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
	RE: PRINTING SERVICES, COMPUTER FORMS.		
498 M	Computer forms, with 2 color face and black back.	15.08/M	7509.84
2 M	Additional:	same	30.16
			7540.00
	4% Va. tax:		301.60
	TOTAL INVOICE:		$7841.60
		8/8 →	1,000.00
		8/22	2500.00
			$ 4341.60
		8/29	2,000.00
			2,341.60

524 C - Independent Expenditure

Ref. Ltr. Expenditure

Rec'd

8304012083C

WHITE—CLIENT GREEN—REMITTANCE CANARY—ACCOUNTING PINK—DDI CHRONOLOGICAL

Diversified Direct, Inc.

INVOICE

2936 Prosperity Avenue • Fairfax (Merrifield), Virginia 22031 • (703) 573-4605

Remit to: DIVERSIFIED DIRECT, INC., c/o U.V.B. BOX 179, ALEXANDRIA, VA 22314

NO. A 2415

DATE Aug. 12, 1980

TO:

National Conservative Political
Action Committee
1500 Wilson Blvd.
Arlington, VA. #513 Suite
22209

SHIPPED TO:

TVC

CUSTOMER ORDER NO.	DATE SHIPPED/ MAILED.	DDI JOB NO. / DDI P.O. NO. / DIVISIONAL JOB NO.	SALESMAN	TERMS
D007 NCPAC 9566	8/7/80	11069	H	NET—30

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
830401	PRINTING SERVICES, COMPUTER LETTERS.		
18 M	Computer letters, with 2 color face and 1 color back.	45.07/M	811.26
1.8 M	Additional:	same	81.12
			892.38
	4% Va. tax:		35.69
	TOTAL INVOICE:		$928.07

Reagan

SAVC

Total
Reagan $4724.35
T'80
(2) 101.18 ea.
(3) 101.19 ea
D - $2391.76

Exhibit G-19

Diversified Direct, Inc.

INVOICE

2936 Prosperity Avenue · Fairfax (Merrifield), Virginia 22031 · (703) 573-4605

Remit to: DIVERSIFIED DIRECT, INC., c/o U.V.B. BOX 179, ALEXANDRIA, VA 22314

NO. A 2386

DATE July 30, 1980

TO:

National Conservative Political
Action Committee
1500 Wilson Blvd. Suite 513
Arlington, Va. 22209

SHIPPED TO:

TVC

CUSTOMER ORDER NO.	DATE SHIPPED/ MAILED.	DDI JCB NO. / DDI P.O. NO. / DIVISIONAL JOB NO.	SALESMAN	TERMS
C 978 C C977A-C	7/30/80	11013	H	NET—30

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
	PRINTING SERVICES, CHESHIRE FORMS.		
10 M	Cheshire forms:, with 1 color face.	53.08/M	530.80
1 M	Additioanl:	same	53.08
			583.88
	4% Va. tax:		23.35
	TOAL INVOICE:		$607.23

524 C
IE Reapar

Exhibit 4-20

Diversified Direct, Inc.

INVOICE

2936 Prosperity Avenue • Fairfax (Merrifield), Virginia 22031 • (703) 573-1605

Remit to: DIVERSIFIED DIRECT, INC., c/o U.V.B. BOX 179, ALEXANDRIA, VA 22314

NO. A 2452

DATE Aug 19, 1980

TO:

National Conservative Political
Action Committee
1500 Wilson Blvd. #513
Arlington, Virginia 22209

SHIPPED TO:

Mediamerica
Alex., Va.

CUSTOMER ORDER NO.	DATE SHIPPED/ MAILED.	DDI JOB NO. / DDI P.O. NO. / DIVISIONAL JOB NO.	SALESMAN	TERMS
C989 NCPAC 9403	8/1/80	11037	H	NET—30

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
	PRINTING SERVICES, LETTERS.		
10 M	Letters, with 2 color face and 1 color back.	68.26/M	682.60
1 M	Additional:	same	68.26
	Authors Alterations:		
	Line shots:		4.00
	Labor: stripping:		60.00
			814.86
	4% Va. tax:		32.59
	TOTAL INVOICE:		$847.45

524c

Reagan

8304208833

Exhibit G-81

Diversified Direct, Inc.

1928

Sept. 5, 1980

REGISTERED

7,622.04

Diversified Direct, Inc,
c/o U.V.B., Box 179
Alexandria, VA 22314

NOT NEGOTIABLE

8/12/80	Payment of Invoice #A 2415				
6/20/80	Balance Due Invoice #A 2176				
7/30/80	Payment of Invoice #A 2386				
8/19/80	Payment of Invoice #A 2452	#524C IE Reagan	$4,724.35		
8/12/80	Payment of Invoice #A 2423	#524C IE McGovern	101.18		
7/18/80	Payment fo Invoice #A 2321	#524C IE Bayh	101.18		
7/24/80	Payment of Invoice #A 2336	#524C IE Culver	101.19		
7/24/80	Payment of Invoice #A 2349	#524C IE Cranston	101.19		
		#524C IE Church	101.19		
		#524D	2,391.76		$7,622.04

Exhibit G-22

Diversified Direct, Inc.

INVOICE

2936 Prosperity Avenue • Fairfax (Merrifield), Virginia 22031 • (703) 573-1605

Remit to: DIVERSIFIED DIRECT, INC., c/o U.V.B. BOX 179, ALEXANDRIA, VA 22314

NO. A 2427

DATE Aug 12, 1980

TO:

National Conservative Political
Action Committee
1500 Wilson Blvd. #513
Arlington, Va. 22209

SHIPPED TO:

DMS

CUSTOMER ORDER NO.	DATE SHIPPED/ MAILED.	DDI JOB NO. / DDI P.O. NO. / DIVISIONAL JOB NO.	SALESMAN	TERMS
D007 NCPAC 9565	8/11/80	11070	H	NET—30

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
	PRINTING SERVICES, LETTERS.		
36 M	Letters, with 1 color face and 2 color back.	21.95/M	790.20
2 M	Additional:	same	43.90
	TOTAL INVOICE:		$834.10

8304208

524 C

Reagan

$834.10

354 8600

Exhibit G-23

Diversified Direct, Inc.

INVOICE

2936 Prosperity Avenue • Fairfax (Merrifield), Virginia 22031 • (703) 573-1605

Remit to: DIVERSIFIED DIRECT, INC., c/o U.V.B. BOX 179, ALEXANDRIA, VA 22314

NO. A 2454

DATE Aug 19, 1980

TO:

Naitonal Conservative Political
Action Committee
1500 Wilson Blvd. #513
Arlington, Va. 22209

SHIPPED TO:

TVC

CUSTOMER ORDER NO.	DATE SHIPPED/ MAILED.	DDI JOB NO. / DDI P.O. NO. / DIVISIONAL JOB NO.	SALESMAN	TERMS
C977A NCPAC 9473	8/4/80	11042	H	NET—30

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
	PRINTING SERVICES, COMPUTER LETTERS.		
146 M	Computer letters, with 3 color face and 1 color back.	17.14/M	2502.44
2 M	Additional:	same	34.28
			2536.72
	Authors Alterations: Labor: stripping:		24.00
			2560.72
	4% Va. tax:		102.43
	TOTAL INVOICE:		$2663.15

#-524C

Delegate Carter

10/17 $ 1,000.00

1,663.15

10/24 1,000.00

663.15

Diversified Direct, Inc.

INVOICE

36 Prosperity Avenue • Fairfax (Merrifield), Virginia 22031 • (703) 573-1605

No. A 2507

Remit to: DIVERSIFIED DIRECT, INC., c/o U.V.B. BOX 179, ALEXANDRIA, VA 22313

Exhibit G-24

Aug 27, 1980

TO:

National Conservative Political
Action Committee
1500 Wilson Blvd.
Suite 513
Arlington, Va. 22209

SHIPPED TO:

TVC

CUSTOMER ORDER NO.	DATE SHIPPED/ MAILED.	DDI JOB NO. / DDI P.O. NO. / DIVISIONAL JOB NO.	SALESMAN	TERMS
C986A NCPAC 9745	8/15/80	11102	H	NET—30

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
	PRINTING SERVICES, LETTERS.		
524 M	Letters, with 3 color face and 1 color back.	13.18/M	6906.32
3 M	Additional:	same	39.54
	Authors Alterations:		2.00
	Line shots:		30.00
	Labor: stripping:		6977.86
	4% Va. tax:		279.11
	TOTAL INVOICE:		$7256.97

#524 C
Reagan

8304042083

WHITE—CLIENT GREEN—REMITTANCE CANARY—ACCOUNTING PINK—DDI CHRONOLOGICAL
GOLDENROD—DDI JOB JACKET

Exhibit G-25

Diversified Direct, Inc.

INVOICE

2936 Prosperity Avenue · Fairfax (Merrifield), Virginia 22031 · (703) 573-1605

Remit to: DIVERSIFIED DIRECT, INC., c/o U.V.B. BOX 179, ALEXANDRIA, VA 22314

NO. A 2511

DATE Aug 28, 1980

TO:

National Conservative Political
Action Committee
1500 Wilson Blvd. #513
Arlington, Va. 22209

SHIPPED TO:

TVC

CUSTOMER ORDER NO.	DATE SHIPPED/ MAILED.	DDI JOB NO. / DDI P.O. NO. / DIVISIONAL JOB NO.	SALESMAN	TERMS
D047 NCPAC 0029	8/28/80	11136	H	NET—30

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
	PRINTING SERVICES, LETTERS.		
150 M	Letteres, with 1 color face and back.	14.96/M	$ 2244.00
1 M	Additional:	same	14.96
			2258.96
	4% Va. tax:		90.36
	TOTAL INVOICE:		$2349.32

Reagan #524C

8304012U836

Exhibit H-1

tri-state envelope corporation of maryland INVOICE

ENVELOPE MANUFACTURERS • 6900 FAIGLE ROAD, BELTSVILLE, MD. 20705 • (301) 792-7170 (202) 953-8579

NUMBER 9763

INVOICE DATE	OUR ORDER NUMBER	YOUR ORDER NUMBER	VIA OUR TRUCK	UNLESS SPECIFIED IN THE CAPTION AREAS BELOW, TERMS: NET 10 DAYS	SHIPPED TO: SAME AS "SOLD TO"
2-12-80	2-0262-80M	0143	X		DMS MD

SOLD TO
Reagan for President Committee
1828 L St NW #201
Wash DC 20036

1=PREPAID 2=COLLECT
1=COMPLETE 2=PARTIAL
1=F.O.B. DESTINATION 2=F.O.B. OUR PLANT
X=CUT CHARGES TO FOLLOW
X=FREIGHT CHARGES TO FOLLOW

QUANTITY	DESCRIPTION	PRICE	AMOUNT
285,000	#9 24 WW OS DS std sty wdw	12.25M	3491.25
	plate		7.50
			3498.75
	MD 5%		174.93
	Total		3673.68
BL# 11782 Dave			

#588/204
$692.71
4-22-80

Okay Cust 3-12-80
To be sent 3-5-80 per phone call from Mary Ann

Please Pay

S/A NO.	SHIP	CUT CHG.	PRT CHG.	SUB-TOTAL	TAX	TOTAL

CUSTOMER COPY

8304042089

Exhibit #-2

THIS MEMORANDUM

DESIGNATE WITH AN (X)
BY TRUCK ☐ FREIGHT ☐

From: TRI STATE EMPLOY OF HO INC
HAGERSTOWN MD

At (Mail or street address of consignee—For purposes of notification only.)

CONSIGNED AND DESTINATION: ZIKE
D M S
ACTON LANE
WALDORF MD

DATE: 5/11 19[illegible]

SHIPPER'S NO.: 1 0 7 7 2

CARRIER

CARRIER'S NO.

OUR TRUCK 9763

ROUTE

DELIVERING CARRIER

CAR OR VEHICLE INITIALS & NO.

NO. PACKAGES	HM (Subject to Correction)	DESCRIPTION OF ARTICLES, SPECIAL MARKS AND EXCEPTIONS	*WEIGHT (Subject to Corr.)	CLASS OR RATE	✓
		4 9 24 WI OS DS STD STX WDOW RECEIVED			
		JOB# 2-0262-801 REAGN FOR PRESIDENT COM			
		2/11/80			
		57			

Subject to Section 7 of conditions of applicable bill of lading, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement.

The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

Per _____ (Signature of Consignor)

If charges are to be prepaid, write or stamp here, "To be Prepaid."

PREPAID

Received $ _____ to apply in prepayment of the charges on the property described hereon.

Agent or Cashier

Per _____

(The signature here acknowledges only the amount prepaid.)

Charges Advanced:

$ _____

SHIPPER'S CERTIFICATION: This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation.

SIGNATURE _____ TITLE _____

* If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is "carrier's or shipper's weight."

* Shipper's imprint in lieu of stamp, not a part of Bill of Lading approved by the Interstate Commerce Commission.

Note—Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.

The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding _____

C.O.D. SHIPMENT
C.O.D. Amt _____
Collection Fee _____
Total Charges _____

THIS SHIPMENT IS CORRECTLY DESCRIBED

CORRECT WEIGHT IS _____ LBS.

† The blank boxes used for this shipment conform to the specifications set forth in the box maker's certificate thereon, and all other requirements of the Consolidated Freight Classification.

Per _____ Shipper

Shipper, Per _____ Agent, Per _____

Permanent post office address of shipper

FORM 1300A REGENT FORMS, WILMINGTON, N.C. 28401

8 3 0 4 2 0 8 7 0

Exhibit H-3

RECEIVED FEC

tri-state envelope corporation of maryland INVOICE

ENVELOPE MANUFACTURERS • 6900 EAGLE ROAD, BELTSVILLE, MD. 20705 • (301) 792-7979
(202) 953-3570

NUMBER 9898

INVOICE DATE	YOUR ORDER NUMBER	YOUR ORDER NUMBER	VIA OUR TRUCK	UNLESS SPECIFIED IN THE CAPTION AREAS BELOW, TERMS: NET 10 DAYS	SHIPPED TO: SAME AS "SOLD TO"					
2-22-80	2-0327-80M		X		DMS MD	1	1	1		

1=PREPAID 2=COLLECT
1=COMPLETE 2=PARTIAL
1=F.O.B. DESTINATION 2=F.O.B. OUR PLANT
X=CUT CHARGES TO FOLLOW
X=FREIGHT CHARGES TO FOLLOW

SOLD TO
Reagan for President Committee
1828 L Street NW #201
Wash DC 20036

QUANTITY	DESCRIPTION	PRICE	AMOUNT
10,000	#9 24 WW OS DS Std Sty Wdw	18.00M	180.00
	State		7.50
			187.50
	MD 5%		9.37
	Total		196.87
SL# 11907 Dave			

Added to cancelled Prospect mailing - will be used later

Finished Invoicing

4-22-80
$ 6921.71
# 588/204

B.L. NO.	SLSM.	CUT CHG.	FRT. CHG.	SUB-TOTAL	TAX	TOTAL

PLEASE PAY

CUSTOMER COPY

8304208911

Exhibit H-4

tri-state envelope corporation of maryland INVOICE

ENVELOPE MANUFACTURERS • 6900 PAIGLE ROAD, BELTSVILLE, MD. 20705 • (301) 792-2170 (202) 922-0270

NUMBER 10100

INVOICE DATE	OUR ORDER NUMBER	YOUR ORDER NUMBER	VIA OUR TRUCK	TERMS: NET 10 DAYS	UNLESS STATED IN THE CAPTION ABOVE SHIPPED TO: SAME AS "SOLD TO"					
9-11-80	8-9509-80M	SWAIN	X		OMS	MD	1	3	1	

1=PREPAID 3=CORRECT
1=COMPLETE 2=PARTIAL
1=F.O.B. DESTINATION 2=F.O.B. OUR PLANT
X=CUT CHARGES TO FOLLOW
X=PRINTING CHARGES TO FOLLOW

SOLD TO
Reagan for President
1828 L Street NW Suite 201
Wash DC 20036

QUANTITY	DESCRIPTION	PRICE	AMOUNT
91,500	6-3/4 24 Blue Wove OS DS Regular	11.25M	1029.38
	plates		12.50
			1041.88
	MD 5%		52.09
	Total		1093.97

8-25-80 Pick up H-F mailing Cut — Invoice # 14

4-22-80 #588/204 $692.71

BL# 12115 Dave

B/L NO.	SLSM	CUT CHG.	PRT. CHG.	SUB-TOTAL	TAX	TOTAL

PLEASE PAY

CUSTOMER COPY

8304041208221

tri-state envelope corporation of maryland

ENVELOPE MANUFACTURERS • 6800 EAGLE ROAD, BELTSVILLE, MD. 20705 • (301) 792-2170

INVOICE

Exhibit H-1

1946

INVOICE DATE	OUR ORDER NUMBER	YOUR ORDER NUMBER	VIA / OUR TRUCK	TERMS: NET 10 DAYS	SHIPPED TO: SAME AS "SOLD TO"
4-7-80	3-0665-80M		X		DMS MD

1=PREPAID 2=COLLECT
1=COMPLETE 2=PARTIAL
1=F.O.B. DESTINATION 2=F.O.B. OUR PLANT
X=CUT CHARGES TO FOLLOW
X=FREIGHT CHARGES TO FOLLOW

SOLD TO:
Reagan for President
1828 L Street Suite 201
Wash DC 20036

QUANTITY	DESCRIPTION	PRICE	AMOUNT
125,000	6-3/4 24 WH OS DS Regular BRE Split Gum	11.25M	1406.25
	plate		7.50
			1413.75
	MD 5%		70.69
	Total		1484.44

17th W
O St
Bldg

RECEIVED

BL# 12592 Dave

B/L NO.	SLSM	CUT CHG.	FRT. CHG.	SUB-TOTAL	TAX	TOTAL

PLEASE PAY

CUSTOMER COPY

8304042089 3

Exhibit I-1

tri-state envelope corporation of maryland

INVOICE

ENVELOPE MANUFACTURERS • 6900 EAGLE ROAD, BELTSVILLE, MD. 20705 • (301) 772-7170
(202) 953-0370

NUMBER 10932

INVOICE DATE	OUR ORDER NUMBER	YOUR ORDER NUMBER	VIA OUR TRUCK	TERMS: NET 10 DAYS	UNLESS OTHERWISE IN THE SPACE ABOVE SHOWN, SHIPPED TO: SAME AS "SOLD TO"
5-16-80	5-1017-80M	NCPAC 8097 C-833 C,D	x		DMS MD

National Conservative Political Committee
1500 Wilson Blvd. #513
Arlington VA 22209

1=PREPAID 2=COLLECT
1=COMPLETE 2=PARTIAL
1=F.O.B. DESTINATION 2=F.O.B. OUR PLANT
X=CUT CHARGES TO FOLLOW
X=FREIGHT CHARGES TO FOLLOW

QUANTITY	DESCRIPTION	PRICE	AMOUNT
420,000	#10 24 BK OS DS Std Sty Wdw	13.75M	5775.00
	plates		18.10
			5793.10
	MD 5%		289.66
	Total		6082.76
		6/20/80	-2,800.00
			3282.76
BL# 13279 Dave		6/27/80	-1600.00
			1,682.76

#524C
IE Reagan

B/L NO.	SLSM	CUT CHG.	FRT. CHG.	SUB-TOTAL	TAX	TOTAL

PLEASE PAY

CUSTOMER COPY

0 4 0 4 2 0 8 2 4

8304042080825

JOB NO. C833C.D4

PURCHASE ORDER

Exhibit I-3

P.O. NO. NCPAC- 8097

DATE May 8, 1980
13

DATE REQUIRED May 16, 1980
1-1-80

BILL TO National Conservative Political Action Committee
1500 Wilson Boulevard, #513
Arlington, VA 22209

SUPPLIER TriState
6900 Faigle Rd.
Beltsville, MD

SHIP TO Diversified Mailing Services
Acton Lane
Waldorf, Md.

ACCOUNT NCPAC/Prospect/Bufkin-Taylor/Mail Codes 20H-H3-H2-20H4-20M-P-Q-R-S-T-U-W

SPECIAL INSTRUCTIONS

1. All invoices must be accompanied by 2 samples.
2. Bill direct to the client named above. By accepting and fulfilling this purchase order the supplier expressly acknowledges and agrees that this purchase order is to be charged against the account of the client named above, and that the client named above shall be solely responsible for the payment of any invoice arising out of this purchase order.
3. Blueline IS required, unless otherwise specified.
4. 25 samples to RAVCO Production office prior to or no later than delivery date.
5. Please notify us immediately if you are unable to ship complete order by 5 p.m. of specified delivery date.
6. Each package, box or skid must be marked according to special instructions on face of purchase order. If packaging instructions do not appear on purchase order please contact ASR.
7. No changes will be binding on client listed on this P.O. unless written authorization is given.
8. All Freight charges are to be prepaid (at vendors expense, to be included in Bid).
9. No under runs will be accepted. Acceptable over runs are as follows:

5M-10M	15%	80M-100M	4%
10M-25M	10%	Over 100M	2%
25M-50M	6%		

QUANTITY ORDERED	QUANTITY RECEIVED	PLEASE SUPPLY ITEMS LISTED BELOW	UNIT PRICE	TOTAL
480,000		ITEM: Standard Window Carriers coded C20H Size: #10 Stock: 24 ~~lb~~ Brown Kraft Ink: PMS Reflex Blue and black Prints: 2/0 Please return camera ready art and provide 10 samples to production dept. upon completion of job.	$13.75/M	
			TOTAL	$5,775.00

ACCOUNT REP

IMPORTANT: OUR PURCHASE ORDER NUMBER AND JOB NUMBER MUST APPEAR ON INVOICES, PACKAGES AND CORRESPONDENCE. INVOICE IN TRIPLICATE. TERMS AND CONDITIONS OF THIS PURCHASE: SEE SPECIAL INSTRUCTIONS ABOVE.

Joe Spiegel
PURCHASING AGENT

FOR OFFICE ONLY:	DATE(s) RECEIVED	DATE ORDER COMPLETED	SUPPLIER WORK NO.	SUPPLIER INVOICE NO.	SUPPLIER INVOICE DATE

QUANTITY RECEIVED

B&J-13.92 Metro-16.13

ADDITIONAL INFORMATION

Exhibit I-2

tri-state envelope corporation of maryland

ENVELOPE MANUFACTURERS • 6900 FAIGLE ROAD, BELTSVILLE, MD. 20705 • (301) 792-7170
(202) 953-3570

INVOICE

NUMBER 11027

INVOICE DATE	OUR ORDER NUMBER	YOUR ORDER NUMBER	VIA OUR TRUCK	UNLESS SPECIFIED IN THE CAPTION AREAS BELOW, TERMS: NET 10 DAYS	SHIPPED TO: SAME AS "SOLD TO"					
5/27/80	5-0939-SOM	NCPAC-7760 C832-a,c,d,g	X		Waldorf, Maryland	1	1	1		

National-Conservative Political
Action Committee
1500 Wilson Blvd. - # 513
Arlington, VA 22209

1=PREPAID 2=COLLECT
1=COMPLETE 2=PARTIAL
1=F.O.B. DESTINATION 2=F.O.B. OUR PLANT
X=CUT CHARGES TO FOLLOW
X=FREIGHT CHARGES TO FOLLOW

QUANTITY	DESCRIPTION		PRICE	AMOUNT
237,000	# 9 24 brown kraft os ds std sty wdow			
		printed	13.80/M	3270.60
4	3 lots	cuts		99.30
	1.) 26,000 - Ca8			
	2.) 180,000 - CC8			3369.90
	3.) 31,000 - CC81	MD5%		168.50
		Total		3538.40
	13141			
	Bl# 13385	Dave		

7/25 + 8/1

#524D = 1.76 20
#524C = 1.76 20
IE Reagan

BY WHO	SHIP	CUT CHG	FRT CHG.	SUBTOTAL	TAX	TOTAL

PLEASE PAY

8304042b8

Exhibit I-5

tri-state envelope corporation of maryland INVOICE

ENVELOPE MANUFACTURERS • 6900 FAIGLE ROAD, BELTSVILLE, MD. 20705 • (301) 792-7170
(202) 953-3570

NUMBER 12019

INVOICE DATE	OUR ORDER NUMBER	YOUR ORDER NUMBER	VIA OUR TRUCK	UNLESS SPECIFIED IN THE CAPTION AREAS BELOW: TERMS: NET 10 DAYS	SHIPPED TO: SAME AS "SOLD TO"					
8-27-80	8-1305-80	NCOAC 9696	x		DMS	MD	1	1	1	

JOB C912

National Conservative Political Action Committee
1500 Wilson Blvd
Arlington VA 22209

1=PREPAID 2=COLLECT
1=COMPLETE 2=PARTIAL
1=F.O.B. DESTINATION 2=F.O.B. OUR PLANT
X=CUT CHARGES TO FOLLOW
X=FREIGHT CHARGES TO FOLLOW

QUANTITY		DESCRIPTION		PRICE	AMOUNT
22,500		Copy was changed by customer after 22,500 envelopes had already been run on the press. These envelopes were bailed per Sandy at RAVCO.			
272,000		#9 24 WW OS DS Std Sty Wdw			
294,500		Total billed for		16.00M	4712.00
			plates		106.00
			restripping		10.00
SL# 13987	(170,000)	Lot 1			
14149	(102,000)	Lot 2 Dave			4828.00
			MD 5%		241.40

EST NO	SLSM	CUT CHG	FRT. CHG.	SUB-TOTAL	TAX	TOTAL
						5069.40

PLEASE PAY

#524C
IE Ranzini

8/1 — 3500.00
1569.40 Bal 8/8

8304042087

Exhibit I-6

tri-state envelope corporation of maryland

INVOICE

ENVELOPE MANUFACTURERS • 6900 FAIGLE ROAD, BELTSVILLE, MD. 20705 • (301) 792-7170
(202) 953-3570

NUMBER 12031

INVOICE DATE	OUR ORDER NUMBER	YOUR ORDER NUMBER	VIA OUR TRUCK	UNLESS SPECIFIED IN THE CAPTION AREAS BELOW: TERMS: NET 10 DAYS	SHIPPED TO: SAME AS "SOLD TO"	
6-30-00	6-1290-80	NCPAC 8681 C897	X		DHS MD	1

1=PREPAID 2=COLLECT
1=COMPLETE 2=PARTIAL
1=F.O.B. DESTINATION 2=F.O.B. OUR PLANT
X=CUT CHARGES TO FOLLOW
X=FREIGHT CHARGES TO FOLLOW

SOLD TO:
National Conservative Political Action Committee
1500 Wilson Blvd#513
Arlington VA 22209

8304049032

QUANTITY	DESCRIPTION	PRICE	AMOUNT
450,000	#9 24 BK OS DS Std Sty Wdw	10.10M	4545.00
	plates		48.00
			4593.00
	MD 5%		229.65
	Total		4822.65
		8/29	2000.00
			2822.65

#524C
IE Reagan

BL# 14112 (175,000)
13853 (275,000) Dave

EXEMPT	SLSM	CUT CHG.	FRT. CHG.	SUB-TOTAL	TAX	TOTAL

PLEASE PAY

Exhibit I-7

tri-state envelope corporation of maryland

ENVELOPE MANUFACTURERS • 6900 EAGLE ROAD, BELTSVILLE, MD. 20705 • (301) 792-7170
(202) 953-3570

INVOICE

NUMBER 12145

INVOICE DATE	OUR ORDER NUMBER	YOUR ORDER NUMBER	VIA OUR TRUCK	UNLESS SPECIFIED IN THE CAPTION AREAS BELOW, TERMS: NET 10 DAYS	SHIPPED TO: SAME AS "SOLD TO"
7-6-80	6-1347-80A	NCPAC 8712	x		DMS md

SOLD TO
National Conservative Polotocal Action Committee
1500 Wilson Blvd #513
Arlington VA 22209

1=PREPAID 2=COLLECT
1=COMPLETE 2=PARTIAL
1=F.O.B. DESTINATION 2=F.O.B. OUR PLANT
X=CUT CHARGES TO FOLLOW
X=FREIGHT CHARGES TO FOLLOW

QUANTITY	DESCRIPTION	PRICE	AMOUNT
140,000	3-5/8 x 7-3/4 24 WW OS DS Regular Split Gum	10.60M	1484.00
	plates		10.00
			1494.00
	MD 5%		74.70
	Total		1568.70
		9/19	850.00
			718.70

DL# 14278 (35,000)
13989 (35,000)
12251 (70,000) Dave

Reagan Supply x Print

B/L NO.	SLSM	CUT CHG.	FRT. CHG.	SUB-TOTAL	TAX	TOTAL

PLEASE PAY

CUSTOMER COPY

CCFSF

Exhibit I-8

tri-state envelope corporation of maryland INVOICE

ENVELOPE MANUFACTURERS • 6900 FAIGLE ROAD, BELTSVILLE, M.D. 20705 • (301) 792-7170 (202) 953-3570

NUMBER 12087

INVOICE DATE	OUR ORDER NUMBER	YOUR ORDER NUMBER	VIA OUR TRUCK	UNLESS SPECIFIED IN THE CAPTION AREAS BELOW: TERMS: NET 10 DAYS	SHIPPED TO: SAME AS "SOLD TO"					
7-7-30	6-1920-80M	NCPAC 8681	X		DUS MD	1	2	1		

JOB C897
National Conservative Political Action Comm
1500 Wilson Blvd #513
Arlington VA 22209

1=PREPAID 2=COLLECT-
1=COMPLETE 2=PARTIAL
1=F.O.B. DESTINATION 2=F.O.B. OUR PLANT
X=CUT CHARGES TO FOLLOW
X=FREIGHT CHARGES TO FOLLOW

QUANTITY	DESCRIPTION	PRICE	AMOUNT
43,000	#9 24 BK OS DS Std Sty W&W	10.10M	434.30
	MD 5%		21.72
	Total		456.02
	#5240 Leagu		
SL= 14115 Dave			

B.O. NO.	SLSM.	CUT CHG.	FRT. CHG.	SUB-TOTAL	TAX	TOTAL

PLEASE PAY

8304042090 1

Exhibit J-1

Reagan Bush

★ ★ ★

TO: COST CENTER COMMITMENT CONTROL GROUP

FROM: Vets Group - Veterans
(COST CENTER NAME)

DATE: 10-20-80

********** USE FOR ALL EXPENSES INCLUDING TRAVEL **********

EXPENSE AUTHORIZATION REQUEST
(EAR)

#11368-3
10-22-80

I request approval to commit the following funds: $4989

VENDOR: Metro Printing and Mailing Services Inc
1200 S. Sterling Blvd
Sterling, Va 22170

10-21-80

AMOUNT: $ 10,800 — DATE TO BE PAID: _____

PURPOSE: Direct mail - Postage.

Signature: Polly A Timbell
(COST CENTER MANAGER)

Signature: _____
(REQUESTING INDIVIDUAL)

8 3 4 0 4 2 0 9 0 2

COST CENTER COMMITMENT CONTROL GROUP

✓ Approved _____ Disapproved

Signature: _____ Date: 10/22/80

TREASURER'S OFFICE

_____ Approved _____ Disapproved

Signature: _____ Date: _____

Bank Code - 01
Cost Center No. 60
Expense Acct No. 58200

RB Form C (8/1/80)

Exhibit J-2

PR[illegible] MAILING SERVICES, INCOR[illegible]T.
1200 South Sterling Blvd., Sterling, Va. 22170—Main Office (703) 471-9000
8446 Lee Highway, Fairfax, Virginia 22031 (703) 573-0900

Invoice No. X1903

Date 10/31/80

Job No.

Cust. P.O.

Reagan-Bush Committee
901 So. Highland St.
Arlington, VA

SALES CODE	J.C.	ACCOUNT NUMBER	J.C.	SHIPPED VIA	TERMS
04					

DESCRIPTION	QUANTITY	PRICE/UNIT	AMOUNT
Check Received:			$10,800.00
Postage Cost:			- 6,296.40
Printing & Mailing Cost:			- 3,722.83
Refunded to Customer:			$ 780.77

Ck # 11368

8304205901

Transactions not paid after 30 days of invoice date will be subject to a finance charge of 1.5% per month. This amounts to an annual interest rate of 18% per year.

Exhibit J-3

METRO ★ ★ ★

P[illegible] MAILING SERVICES, INCO[illegible]ATI
1200 South Sterling Blvd., Sterling, Va. 22170—Main Office (703) 471-9000
8446 Lee Highway, Fairfax, Virginia 22031 (703) 573-0900

Invoice No. 31505

Date 10/31/80

Job No.

Cust. P.O.

To: [illegible]-Lynn Committee
[illegible] So. Highland St.
Arlington, VA.

SALES CODE	LOC	ACCOUNT NUMBER	JC	SHIPPED VIA	TERMS
04					

DESCRIPTION	QUANTITY	PRICE/UNIT	AMOUNT
To be Received:			[illegible]
Postage Fees:			- 6,246.00
Printing & Mailing Cost:			- [illegible]
Refunds to Customer:			[illegible]

330420900

Ck # 1136

Transactions not paid after 30 days of invoice date will be subject to a finance charge of 1.5% per month. This amounts to an annual interest rate of 18% per year.

MEMORANDUM

Exhibit #1

Ex. 1 (b)
11-17-81, Hearings
DV

To: Bay Buchanan

From: Cheryl Gwaim

Subject: Required Checks

Date: February 20, 1980

In order to procure goods and services required for our March 3, 1980, prospect mailing and March 7, 1980, Reagan ~~for President~~ house file mailing, it is necessary that the following three checks be federal expressed to me today.

Amount of Check	Provider (to whom check should be made) & Address
1. $1,763.00 #1228/2264 Feb 22, '80	Todd Allan Printing 802 Rhode Island Avenue, N.E. Washington, D.C. 20018 to be used to pay for 265,000 Ronald Reagan pictures to be used as inserts for prospect mailings - at $ 6.65 per thousand.
2. $3925.00 #1229/2264 Feb. 22	Wiland & Associates ~~219 East Davis Street~~ Culpepper, Va. 22701 to be used for laser printing of approximately 75,000 letters and response devices for RFP-house file mailing - at $ 46.00 per thousand, plus $250 for tape conversion
3. $3,347.50 #1230/2264 Feb. 22	Atlantic List Company, Inc. 2100 M Street, N.W., Suite 307 Washington, D.C. 20037 to be used to rent names from Daily News Digest at $ 73.00 per thousand and California Ringmakers at $ 60.00 per thousand - these lists have been proven to work for us.

Without my immediate receipt of these checks, the necessary goods and services cannot be possibly obtained.

Thank you.

Cheryl Gwaim

8304042090

Exhibit R-2

Ex 1 (i)
11-17-81, Lawrence
SV

MEMORANDUM

To: Bay Buchanan

From: Cheryl Swaim

Date: April 10, 1980

Enclosed are invoices for the Reagan for President-House File 16th mailing which dropped on March 28, 1980. Among these invoices is a warehouse charge by Diversified. All have been reviewed and found to be according to agreements.

Samples of the 16th mailing are enclosed. In addition, a cost analysis for this mailing is enclosed.

With my memorandum of March 1, 1980, were samples of the "$1,000 Legal Limit" letters. I have sent additional samples to Judy Harrison, at her request, who will deliver them to you.

The 17th mailing is scheduled for the week of April 20, 1980. Immediate expenses for this mailing are as follows:

Amount	Vendor & Address	Purpose
$5,710.13	Wiland & Associates 219 East Davis Highway Culpeper, Va. 22701 Attn: Bob Perrott	laser-printing of 53,121 letters and 56,622 2-up response devices
$14,238.05	U.S. Postmaster	12,611 @ .30 each (high donor 40,510 @ .15 each 52,122 @ .084 each

Thank you for your time.

Cheryl

RECEIVED APR 17 1980

8304042906

117 Smith Avenue
Mount Kisco, N. Y. 10549
(914) 666-2750

Exhibit 5-1

RECEIVED FEB 15 1980

February 5, 1980

Mr. Charlie Black
Reagan for President
1828 "L" Street, NW
Suite # 201
Washington, DC 20036

Dear Charlie;

This should serve as an invoice for work conducted for the Reagan for President Committee:

Study	Month	Cost
Iowa (600 samples)	11/79	$12,000 pd.
Iowa (600 samples)	12/79	6,000
Consulting	1/1-1/31/80	3,000
Consulting	2/1-2/29/80	3,000
Expenses		44

Please make check payable to A.J.F. & Associates for $24,044.00.

Your attention to this matter would be greatly appreciated.

Sincerely,

Ronald W. Finkelstein

RWF:amk

83040420907

Exhibit L-2

Arthur J. Finkelstein & Associates
142 South Avenue
Mount Kisco, N.Y. 10549
(914) 666-2750

March 4, 1980

Ms. Bay Buchanan
Reagan for President
9841 Airport Boulevard
Suite # 1430
Los Angeles, CA 90045

Dear Ms. Buchanan;

This should serve as an invoice for work conducted for the Reagan for President Committee:

STUDY	MONTH	COST
Iowa (600 samples)	12/79	$6,000
Consulting	1/1-1/31/80	$3,000
Consulting	2/1-2/29/80	$3,000
Consulting	3/1-3/31/80	$3,000
Expenses		44
Expenses (see attached)	2/12/80	270.02

Please make check payable to A.J.F. & Associates for $15,314.02.

Your attention to this matter would be greatly appreciated.

Sincerely,

Ronald W. Finkelstein

RWF:emk

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8304209008

Exhibit L-3

Arthur J. Finkelstein & Associates
111 South Avenue
Mount Kisco, N. Y. 10549
(914) 666-2750

April 7, 1980

Ms. Bay Buchanan
Reagan for President
9841 Airport Boulevard
Suite # 1430
Los Angeles, CA 90045

Dear Bay;

Thank you for the recent check.

This should serve as an invoice for work conducted for the Reagan for President Committee:

STUDY	MONTH	COST
Consulting	1/1 - 1/31/80	$3,000.00
Consulting	2/1 - 2/29/80	3,000.00
Expenses		44.00
Expenses (letter 3/4/80)		270.02
Total		~~$6,314.02~~ 6044.02

As per our agreement $3,000, is due in April, and the balance due in May.

Sincerely,

RW Finkelstein

Ronald W. Finkelstein

RWF:emk

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Exhibit L-4

Arthur J. Finkelstein & Associates
117 South Main
Mount Kisco, N. Y. 10549
(914) 666-2750

May 1, 1980

Ms: Bay Buchanan
Reagan for President
9841 Airport Boulevard
Suite #1430
Los Angeles, CA 90045

Dear Bay;

Thank you for the recent check.

This should serve as an invoice for work conducted for the Reagan for President Committee:

Consulting	2/1 - 2/29/80	$3,000.00
Expenses		44.00
Expenses (letter 3/4/80)		~~270.02~~
Total		~~$3,314.02~~ 3044.02

Rd. 6-5-80 - 435. Rig. $3044.00

Your attention to this matter would be appreciated.

Sincerely,

RWF/dhd

Ronald W. Finkelstein

Must pay out of recently approved

P.S. Thanks for keeping your word to me.

RWF:emk

RECEIVED MAY - 7 1980

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Exhibit. 4

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

Request for Answers to Written Questions

TO: Arthur J. Finkelstein
Arthur J. Finkelstein and Associates
117 Smith Avenue
Mount Kisco, New York 10549

RE: MUR 1252/1299

Arthur J. Finkelstein is asked to submit responses in writing and under oath to the interrogatories propounded herein to the Federal Election Commission within ten days of receipt of this request.

Please answer the following interrogatories:

A. Describe the nature of your work as a political consultant for the Reagan for President Committee between March, 1979 and July 15, 1980.

Describe in detail the specific services and activities which you performed in connection with your work for the Reagan for President Committee for which you received compensation in February, March and April, 1980. What was the date of your final assignment as a consultant for this Committee?

Did you maintain contacts with representatives of the Reagan for President Committee after completion of your final assignment and through the remainder of 1980? If so, with whom did you remain in contact?

B. Did you ever serve as a consultant for the Reagan/Bush Committee? If so, please describe your responsibilities in this regard.

C. Describe the nature of your work, and that of other representatives of Arthur J. Finkelstein and Associates, for the Fund for a Conservative Majority ("FCM") in 1979 and 1980?

Did you, or anyone else at your firm, suggest that FCM pay for an opinion survey in Wisconsin in March, 1980? If your answer is yes, please describe the circumstances that led to this suggestion. If your answer is no, please state who originated the idea for such a survey?

Please describe your role, and the roles of others at Arthur J. Finkelstein and Associates, in the formulation of questions to be asked during the March, 1980 survey in Wisconsin paid for by FCM?

8304042091 1

Did you ever inform representatives of FCM of information concerning the Reagan for President Committee's strategy, priorities or concerns which was gleaned as a result of your work as a consultant for the latter committee?

Did you use any such information in the formulation of questions to be used in the March, 1980 survey in Wisconsin by FCM? If your answer is yes, please specify the information used.

Please describe your role, or that of other representatives of Arthur J. Finkelstein, in the utilization by FCM of information derived from the March, 1980 survey in Wisconsin conducted by your firm for FCM.

D. Please describe the nature of your work, and that of other representatives of Arthur J. Finkelstein and Associates, for the National Conservative Political Action Committee ("NCPAC") in 1979 and 1980.

Please summarize the content of the surveys undertaken by Arthur J. Finkelstein and Associates for NCPAC for which payments of $2,000 and $10,700 were made on May 9, 1980 and November 13, 1980, respectively.

What were the populations targeted by these surveys?

Please describe your role, and the roles of others at Arthur J. Finkelstein and Associates, in the formulation of questions to be asked during these NCPAC surveys.

Did you ever inform representatives of NCPAC of information concerning the Reagan for President Committee's, or the Reagan/Bush Committee's, strategy, priorities or concerns which was gleaned as a result of your work as a consultant for an authorized Reagan committee?

Did you use any such information in the formulation of questions to be used in the voter surveys paid for by NCPAC on May 9, 1980 and November 13, 1980?

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HAND DELIVERED

Exhibit A-2

Arthur J. Finkelstein & Associates
117 South Avenue
Mount Kisco, N.Y. 10549
(914) 666-2750

? JUL 6 P4:25

DATE: July 1, 1982

TO: Federal Election Commission

FROM: Arthur J. Finkelstein & Associates, Inc.

RE: MUR 1252/1299

A. Between September, 1979 and February 28, 1980 I was retained as a consultant by the Reagan for President Committee, but was not utilized extensively. During this period the total scope of services were:

1. Reviewed Ronald Reagan's announcement speech.
2. Conducted Iowa statewide survey, 600 interviews prior to January delegate caucuses. All services were terminated as of February 28, 1980.
3. During the time period mentioned, occassional phone conversations concerning strategy - Plus perhaps three or so days of work: One in New Hampshire, one in California, and one hour speech in Wisconsin.
4. I did not, nor did anyone at A.J.F. & Associates, Inc., have any further contact with any representative with the Ronald Reagan for President Committee.

B. No

C. Conducted statewide Wisconsin survey, 600 interviews, in March, 1980 and gave report.

No, I did not nor did anyone else to my knowledge at A.J.F. & Associate Inc. suggest that the Fund for a Conservative Majority pay for an opini survey in Wisconsin in March, 1980. Ralph Galliano, former executive director of F.C.M., came to us with the idea to "piggy-back" questions on a survey originally planned for our client Doug Cofrin, United State candidate for Senate.

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In the formulation of questions to be asked during the March, 1980 survey in Wisconsin paid for by F.C.M., we wrote the questions. Submitted them to F.C.M. in draft form. They made changes and returned the final draft to us.

I never informed representatives of F.C.M. of information concerning the Reagan for President Committee's strategy or any other matters. No such information was used in the formulation of questions to be used in the March, 1980 survey in Wisconsin by F.C.M.

I, nor any other representative of Arthur J. Finkelstein & Associates, Inc., played a role in the utilization by F.C.M. of the information derived from the March, 1980 survey in Wisconsin.

D. The nature of work done by representatives of Arthur J. Finkelstein & Associates, Inc. and myself for the National Conservative Political Action Committee included surveys for which our firm was compensated and voluntarily speaking at NCPAC campaign schools without compensation.

The payment of $2,000 on May 9, 1980 was made for a survey of the Fifth Missouri Congressional District. This survey was designed to probe the feasibility of defeating Congressman Richard Bolling.

The payment of $10,700 on November 13, 1980 was made for a statewide survey of Iowa. This survey was designed to probe the feasibility of defeating Senator John Culver.

300 interviews and 500 interviews were the sample sizes for the 5th Missouri C.D. and Iowa surveys, respectively. Interviews were conducted randomly within predetermined election units of registered voters.

In the formulation of questions to be asked in these surveys paid for by NCPAC, we wrote the questions. Submitted them to NCPAC in draft form. NCPAC made the changes they desired.

I never informed representatives of NCPAC of information concerning the Reagan for President Committee's, or the Reagan/Bush Committee's strategy, priorities or concerns. No such information was used in the formulation of questions to be used in these surveys. Nor was I aware, other than through normal news channels, of the Reagan or Reagan/Bush strategies.

Arthur J. Finkelstein — Date 6-30-82

Sworn to Notary Dion P. Hoey

DION P. HOEY
NOTARY PUBLIC, State of [illegible]
No. 4743224
Qualified in Nassau County
[illegible] March 30, 1983

83040420914

Exhibit M-3

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

REQUEST FOR ANSWERS TO ADDITIONAL WRITTEN QUESTIONS

TO: Arthur J. Finkelstein
Arthur J. Finkelstein and Associates
117 Smith Avenue
Mount Kisco, New York 10549

Arthur J. Finkelstein is asked to submit responses in writing and under oath to the interrogatories propounded herein to the Federal Election Commission within ten days of receipt of this request.

1. In sub-section A, paragraph 3 of your July 1, 1982 response to question A of the Commission's Request for Answers to Written Questions, dated June 5, 1982, you indicated that between September, 1979 and February 28, 1980, you were involved in "occasional phone conversations concerning strategy" in connection with your work for the Reagan for President Committee for which you received compensation in February, March and April, 1982. Please answer the following questions with regard to these conversations:

   a. With which individual or individuals at the Reagan for President Committee were the conversations conducted?

   b. When did these conversations take place?

   c. What particular element(s) of strategy was discussed during each conversation?

   d. What was the strategy discussed? In particular, did the strategy discussed involve campaigns in certain specific states? If so, which states?

   e. To your knowledge, was any action taken as a result of these strategy discussions? If so, what action?

2. In sub-section A, paragraph 5 of your July 1, 1982 response, you also cite "three or so days of work" for the Reagan for President Committee in New Hampshire, California and a one hour speech in Wisconsin. Please answer the following questions with regard to these assignments.

   a. What was the specific nature of your work for the Reagan for President Committee in New Hampshire?

   Who served as your contact(s) within the Reagan for President Committee regarding this assignment in New Hampshire?

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b. What was the specific nature of your work for the Reagan for President Committee in California?

Who served as your contact(s) within the Reagan for President Committee regarding this assignment in California?

c. Before what organization or group did you speak in Wisconsin on behalf of the Reagan for President Committee?

What was the topic of this speech?

3. Sub-section C, paragraph 5 of your response could be read as stating that you personally played a role in using the results of the survey in Wisconsin which your organization undertook for FCM. Is that a correct interpretation? If not, please clarify the meaning of your response.

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Exhibit A-4
Conf# 82,27

82 AUG 5 P1:31

AUG 5 P3:56

Arthur J. Finkelstein & Associates
117 South Avenue
Mount Kisco, N.Y. 10549
(914) 666-2750

FEDERAL ELECTION COMMISSION
July 28, 1982 RE: MUR 1252/1299

1a. I was not called often - And I can't recall each call, but I received calls by and large from people with the Committee who know me from previous campaigns and not necessarily campaign related. Among calls that were related, were calls from Elizabeth Doyle in New York State, Frank Donatelli, the Mid-West Coordinator, and the New Hampshire State Chairman Senator Gordon Humphrey.

b. During normal business hours.

c. Frank Donatelli asked me if I would speak in Wisconsin. Elizabeth Doyle asked me if I thought Reagan would win. Senator Humphrey asked me what Ronald Reagan should do after the Iowa loss.

d. I wasn't engaged in strategy with anyone by phone other than New Hampshire. In New Hampshire I suggested that Governor Reagan should go on television and speak out strongly on conservative principles.

e. I have no reason to believe any specific action was taken on my advice.

2a. I went to New Hampshire to look at their campaign plan and make suggested changes. I made none other than they should buy television time for older voters.

I met with Bob Monier and others I don't recall.

b. None. I looked at the Reagan announcement speech before he gave it. I went to Los Angeles to see the speech - I read it in my hotel room. The speech was left in an envelope with a secretary.

c. Reagan volunteers. Topic - Why Reagan would win.

3. I played no role in the utilization of the F.C.M. survey.

Arthur J. Finkelstein — 8-4-82 Date

Sworn to Notary
DION P. HOEY
NOTARY PUBLIC, State of New York

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Exhibit N-1

Arthur J. Finkelstein & Associates
112 South Avenue
Mount Kisco, N.Y. 10549
(914) 666-9750

October 16, 1980

Mr. Robert Sparks
Sedam & Herge
7600 Old Springhouse Rd.
McLean, VA 22102

Dear Mr. Sparks:

The check sent by the National Conservative Political Action Committee around the 10th of June, 1980 to A.J.F. & Associates, was earmarked specifically for the following:

a) Survey in South Carolina 6th C.D. (partial payment) $1,000.

b) Travel expenses reimbursed (speaking for NCPAC schools/seminars). The total was $1,416.69.

With regard to the survey, at no time did A.J.F. & Assoc. advocate the election or defeat of any Presidential candidate.

Sincerely,

Ronald W. Finkelstein

RWF:dhd

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Exhibit N-2

Arthur J. Finkelstein & Associates
111 South Avenue
Mount Kisco, N.Y. 10549
(914) 666-2750

October 16, 1980

Mr. Curtis Herge
Sedam & Herge
7600 Old Springhouse Rd.
McLean, VA 22102

Dear Curt:

In the past, Arthur J. Finkelstein & Associates has done survey work for the National Conservative Political Action Committee only for Senate, Congressional, and State elections. In every instance, no statements advocating either the election or the defeat of any candidate existed.

NCPAC paid for and saw only its surveys.

Arthur J. Finkelstein was a member of the National Republican Advisory Committee. His participation with this Committee was at best non-existent. He never went to meetings or got actively involved with other Advisory members concerning the Committee's business.

I hope this will answer all questions that you may have. If additional information is needed, please feel free to call.

Sincerely,

Ronald W. Finkelstein

RWF:dhd

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Exhibit N-3

Arthur J. Finkelstein & Associates
117 South Avenue
Mount Kisco, N.Y. 10549
(914) 666-2750

SOUTH CAROLINA - SEPTEMBER, 1979

1. Media market

   1. Columbia 2. Rest

2. Are you registered and expecting to vote in the next general election?

   1. Yes 2. No/All other responses (TERMINATE)

3. If you were to label yourself, would you say you are a Liberal, a Moderate or a Conservative in your political beliefs?

   1. Liberal 2. Moderate 3. Conservative 4. Don't know/Refu

4. What is the most important issue facing the United States today?

   _____

5. What is the most important issue facing the state of South Carolina today?

   _____

6. Now I am going to read you a list of names. Will you please tell me if you have a favorable or unfavorable opinion of each? If you have no opinion or have never heard of the person, just say so.

	Favorable	Unfavorable	No Opinion	Never Heard Of
a. Jimmy Carter				
b. Strom Thurmond				
c. Ernest F. Hollings				
d. Richard Riley				
e. Floyd Spence				
f. Kenneth L. Holland				
g. Eddie Chiles				
h. The Western Company				

7. Can you tell me what the Western Company does?

   _____

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8. Who or what is most responsible for our energy crisis?

9. Who do you think can best handle our energy problems - the Government or private industry?

1. Government 2. Private industry 3. Don't know/ Refuse

10. What percent of profit do you think the oil companies net on the sale of gasoline?

1. Between 0-5% 2. Between 6-10% 3. Between 11-20%
4. Between 21-30% 5. Between 31-40% 6. Between 41-50%
7. Over 50% 8. Don't know/Refused

11. Do you think there are too many, too few or just the right amount of government regulations concerning energy?

1. Too many 2. Too few 3. Right amount 4. Don't know

12. What one person if any do you most associate with the oil industry

13. Would you please tell me if you agree or disagree with each of the following statements?

	Agree	Disagree	Don't know
a. The oil companies have been good for America			
b. The oil companies are making far too much profit and should be taxed heavily			
c. There really is not an energy crisis at all			
d. 20 million Americans share in the oil companies' profits			

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14. Could you tell me if you approve or disapprove of each of the following?

	Approve	Disapprove	Don't know
a. A special windfall profit tax on oil companies			
b. Decontrol of oil and gas prices			
c. Gas rationing			
d. Nationalizing all oil companies			
e. Deregulation of the oil industry			

15. Which of the following would make you more likely and which would make you less likely to vote for a candidate running for high public office?

	More Likely	Less Likely	No Difference	Don't know
a. A socialist				
b. An incumbent				
c. A liberal				
d. A bureaucrat				
e. A politician				

16. Could you tell me if you agree or disagree with the following statements?

	Agree	Disagree	Don't know
a. Ernest Hollings is a socialist			
b. Ernest Hollings is a liberal			

17. What radio station do you listen to most often?

_____

18. With wich political party are you affiliated?

1. Republican 2. Democrat 3. Independent

4. Other (specify)_____ 5. Don't know/Refused

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19. Would you say you always vote Democrat, usually vote Democrat, vote for as many Democrats as Republicans, usually vote Republican or always vote Republican?

1. Always Democrat 2. Usually Democrat 3. Democrat/Republi

4. Usually Republican 5. Always Republican 6. Don't know/Refus

20. What is the last grade of formal education you have completed?

1. Grade school or less 2. Some high school 3. High school gra

4. Some college 5. College graduate 6. Refused

21. Do you or does any member of your family who lives in this household belong to a labor union?

1. Yes 2. No 3. Don't know/Ref

22. What is your annual family income - Is it under $8,000, between $8,001 & $15,000, between $15,001 & 20,000, between $20,001 & $30,000 or over $30,000?

1. Under $8,000 2. Between $8,001 & $15,000

3. Between $15,001 & $20,000 4. Between $20,001 & $30,000

5. Over $30,000 6. Don't know/Refused

23. What is your religion?

1. Protestant 2. Catholic 3. Jewish 4. Atheist/Agnostic

5. Other 6. Don't know/Refused

24. What is your race?

1. White 2. Black 3. Other

25. What is your age?

1. 18-25 2. 26-40 3. 41-55 4. 56-65 5. Over 65

6. Refused

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Exhibit #4

26. Sex?

1. Male 2. Female

Respondent's Name _____

Street _____

Phone # _____

City _____ State _____ Zip _____

Interviewer's Name _____

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Exhibit K-4

Arthur J. Finkelstein & Associates
111 South Main
Mount Kisco, N.Y. 10549
(914) 666-2750

May 2, 1980

Mr. Terry Dolan
1500 Wilson Boulevard
Suite # 513
Arlington, VA 22209

Dear Terry:

The following list of monies are due A.J.F. & Associates) NCPAC/NCPEF/NCSEF and expenses:

Colorado - 1st C.D.	4/80	(NCPAC)	$3,000.00
Missouri - Statewide	4/80	(NCPAC)	7,500.00
		(NCSEF)	7,500.00
		SEF	
Washington - Statewide	4/80	(NCPAC)	500.00
		(NCSEF)	500.00
		SEF	
South Carolina - 6th C.D.	2/80	(NCPAC)	1,000.00
Missouri - 5th C.D.	4/80	(NCPAC)	3,750.00
Expenses (1-way)			170.00
Illinois - 10th C.D.	4/80	(NCPEF)	6,400.00
Expenses (attached)			1,416.69
Complete total			$31,736.69
			21736.69

Your attention to this matter would be appreciated.

Sincerely,

Ronald

Ronald K. Finkelstein

Expenses (Letter dated 3/7/80)

Washington	2/13/80	Plane	102.00
		Trans.	15.00
Los Angeles	2/27/80	Plane	618.00
		Hotel	24.00
		Misc.	6.00
Washington	3/11/80	Plane	141.00
		Hotel	78.70
		Hotel	9.51
		Transp.	14.00
		Total	1,093.21

WCAC Expenses

Washington	2/9 - 2/10/80	Hotel	70.00
		Plane	125.00
		Hotel	77.48
		Trans	26.00
		Food	25.00
		Total	$ 323.48

Duplicated in #1476-69

EXHIBIT C

EXHIBIT C

SCHEDULE A — ITEMIZED RECEIPTS

Page 1 of 1 for LINE NUMBER: 15

(Use additional copy(ies) for each category of the Detailed Summary Page)

Any information copied from such Reports or Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (In Full)
National Conservative Political Action Committee

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Sundance Broadcasting, Inc. Boise, ID	Refund - Broad-casting cancelation	7/23/80	4.80
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Occupation		
	Aggregate Year-to-Date—$		
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Working Names Inc. 1629 K Street NE Washington, DC	Mail list rental Mail canceled	7/23/80	69.81
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Occupation		
	Aggregate Year-to-Date—$		
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Reagan for President Committee 809 Cameron Street Alexandria, VA 22314	Sale of Memory Typewriter	7/15/80	2,200.00
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Occupation		
	Aggregate Year-to-Date—$		
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Westpark Travel 2600 Wespark Drive McLean, VA	Refund of travel Expense	7/15/80	125.00
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Occupation		
	Aggregate Year-to-Date—$		
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Western Union P. O. Box 26208 Richmond, CA 23260	Refund on Mailgram	7/23/80	70.00
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Occupation		
	Aggregate Year-to-Date—$		
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Occupation		
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date—$		
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Occupation		
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date—$		

SUBTOTAL of Receipts This Page (optional) 2,469.61

TOTAL This Period (last page this line number only)

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Exhibit O-2

National Conservative Political Action Committee

300 wilson blvd. suite 513 arlington, va. 22209 (703) 522-2800

October 17, 1980

Mr. Curt Herge
Sedam & Herge
7600 Old Springhouse Rd.
McLean, VA — 22102

Dear Curt:

I've researched the sale of the equipment to the Reagan Campaign and have found the following.

Back in September of 1979 NCPAC's Office Manager Lisa Stoltenberg decided to update some of our office equipment. Because of space problems we needed to sell the old equipment, before we could take delivery of the new. The equipment sold was an IBM Memory typewriter and the equipment purchased was an Olivetti word processor model TES 501. Ms. Pieden of the Reagan Campaign negotiated the sale price of $2,200, with Lisa Stoltenberg and took possession of the equipment. On 7/15/80 we received payment in full and on 7/16/80 we deposited the payment.

If you have any further questions, please do not hesitate to contact me.

Sincerely,

Candace M. Taw
Office Manager

CMT:nkm

National Conservative Political Action Committee
wilson blvd. suite 513 arlington, va. 22209 (703) 522-2800

EXHIBIT

February 22, 1980

Neal Peden
c/o Reagan for President
1828 L Street, NW #201
Washington, D.C. 20036

Dear Neal,

It has come to my attention that the Reagan campaign has agreed to buy the IBM memory typewriter they have had in their possession since October of 1979. The confirmed price of this machine was to be $2,200.00.

Since it has been quite a while since this deal was made and no action has been taken towards payment; I am asking now for a check for $2,200.00 to NCPAC for the purchase of the machine mentioned above. I am leaving the Committee soon and I would like to see this cleared up before I go.

If you have any questions about this, please give me a call.

Sincerely,

Becki C. Burlingame
Treasurer

BCB:jd

jd. 7-1-80
5983-542
$ 2200.00

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17

FEDERAL ELECTION COMMISSION

NCPAC Telephone bills

The above-described material was removed from this file pursuant to the following exemption provided in the Freedom of Information Act, 5 U.S.C. Section 552(b):

____	(1) Classified Information	✓	(6) Personal privacy
____	(2) Internal rules and practices	____	(7) Investigatory files
____	(3) Exempted by other statute	____	(8) Banking Information
____	(4) Trade secrets and commercial or financial information	____	(9) Well Information (geographic or geophysical)
____	(5) Internal Documents		

Signed Lynne A. Weissenborn

Date 6/23/83

FEC 9-21-77

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RECEIVED
FEC # 7888

82 JUN 7 AM : 01

SEDAM & HERGE
A PROFESSIONAL CORPORATION
ATTORNEYS AT LAW
SUITE 1100
8300 GREENSBORO DRIVE
McLEAN, VIRGINIA 22102
(703) 821-1000

GLENN J. SEDAM, JR.
J. CURTIS HERGE
ROBERT R. SPARKS, JR.
A. MARK CHRISTOPHER

JANIS A. CHERRY
KAREN LUSSEN BLAIR
JOHN ROBERT CLARK III
B. ERIC SIVERTSEN

SUITE 270
1700 PENNSYLVANIA AVENUE, N.W.
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(703) 821-1000
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CABLE: SEDAMHERGE

June 4, 1982

RECEIVED
FEC
82 JUN 7 P1:05

Ms. Anne Weissenborn
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: MUR 1252/1299

Dear Anne:

In response to your question concerning a line item showing an expenditure of $10,700.00 to Arthur J. Finkelstein and Associates, on November 13, 1980, reflected on Schedule B of NCPAC's report to the Commission for the period October 16, 1980 through November 24, 1980 (Exhibit J to Mr. Dolan's deposition), the facts appear to be as follows:

Subsequent to NCPAC's filing of that report, an amended report was filed showing an expenditure of $10,700.00 to Finkelstein. That expenditure was for general polling services rendered by Finkelstein to NCPAC, and is listed as a general operating expenditure by NCPAC on Schedule B. In the same amended report, NCPAC listed $500.00 in in-kind expenditures to two South Dakota congressional races ($250.00 to each candidate). Those in-kind contributions consisted of contributions by NCPAC to the candidates of polling results obtained from Finkelstein. Thus, NCPAC's amended filings reflect that the $10,700.00 expenditure you have questioned actually consists of $10,200.00 to Finkelstein for general polling services, and in-kind contributions of $250.00 each to two congressional candidates. I enclose copies of NCPAC's earlier-filed amended report showing the correct form of the questioned expenditures.

I trust this answers your questions. Please feel free to contact me if you have any questions in this matter.

Sincerely,

Robert R. Sparks, Jr. cgr

Robert R. Sparks, Jr.

8304020937

REPORT OF RECEIPTS AND DISBURSEMENTS
For Political Committee Other Than an Authorized Committee

(Summary Page)

RECEIVED
82 JUN 7 AM : 01

1. Name of Committee (in Full)
National Conservative Political Action Committee

Address (Number and Street)
1500 Wilson Blvd., Suite 513

City, State and ZIP Code
Arlington, VA 22209

☐ Check if address is different than previously reported.

2. FEC Identification Number
C00024687

3. ☐ This committee qualified as a multicandidate committee during this Reporting Period on _____ (date)

4. TYPE OF REPORT (check appropriate boxes)

(a)
- ☐ April 15 Quarterly Report
- ☐ July 15 Quarterly Report
- ☐ October 15 Quarterly Report
- ☐ January 31 Year End Report
- ☐ July 31 Mid Year Report (Non-election Year Only)
- ☐ Monthly Report for _____
- ☐ Twelfth day report preceding _____ (Type of Election) election on _____ in the State of _____
- ☒ Thirtieth day report following the General Election on 11/4/80 in the State of _____
- ☐ Termination Report

(b) Is this Report an Amendment? ☒ YES ☐ NO

SUMMARY	Column A This Period	Column B Calendar Year-to-Date
5. Covering Period 10/16/80 Through 11/24/80		
6. (a) Cash on Hand January 1, 19[illegible]		$ 52,357.67
(b) Cash on Hand at Beginning of Reporting Period	$ 215,056.54	
(c) Total Receipts (from Line 18)	$ 991,503.91	$ 5,102,203.37
(d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B)	$ 1,206,560.55	$ 5,154,561.04
7. Total Disbursements (from Line 28)	$ 1,113,748.38	$ 5,061,748.87
8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d))	$ 92,812.17	$ 92,812.17
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D)	$ 13,752.60	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)	$ 215,088.25	

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Candace M. Taw
Type or Print Name of Treasurer

SIGNATURE OF TREASURER _____ Date _____

For further information, contact:
Federal Election Commission
Toll Free 800-424-9530
Local 202-523-4068

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

All previous versions of FEC FORM 3 and FEC FORM 3a are obsolete and should no longer be used.

FEC FORM 3X (3/80)

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